

Pilot Pentland Firth and Orkney Waters Marine Spatial Plan

Consultation Report

PILOT PENTLAND FIRTH AND ORKNEY WATERS MARINE SPATIAL PLAN

CONSULTATION REPORT:

Planning Issues and Options Consultation Paper

Report prepared by the Pilot Pentland Firth and Orkney
Waters Working Group:

marinescotland



EXECUTIVE SUMMARY

This Consultation Report outlines how the comments received during the consultation on the Planning Issues and Options Consultation Paper will be taken into account during the drafting of the Pentland Firth and Orkney Waters Marine Spatial Plan. The text summarises the main findings of the analysis of the comments and provides a list of the general and sectoral policies that will be contained within the draft Plan. The table contained within the annex provides an action or note for the Working Group against each of the comments received and these will be used to inform the drafting of the Marine Spatial Plan.

ACKNOWLEDGEMENTS

The Working Group would like to thank everyone that contributed to the consultation by sending in responses or attending the consultation events in Kirkwall and Thurso. We also thank the International Centre for Island Technology (ICIT) at Heriot Watt University for their assistance and contribution to the workshops.

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1. Introduction

1.1 Background

- 1.1.1 A pilot Pentland Firth and Orkney Waters Marine Spatial Plan is currently being developed by a Working Group consisting of Marine Scotland, the Highland Council and Orkney Islands Council. A [Plan Scheme](#) was published in November 2012 and this outlined the process of developing the marine spatial plan and indicated when there would be an opportunity for public consultation.
- 1.1.2 A National Marine Plan is currently being prepared and will provide a planning framework to manage the competing demands for the use of the sea whilst protecting the marine environment. The National Marine Plan outlines the requirement for regional marine plans to be developed across Scotland and this pilot marine spatial plan will provide the basis for the future development of Regional Marine Plans.
- 1.1.3 The Working Group prepared two documents, a [Planning Issues and Options Consultation Paper](#) and a [draft Environmental Report](#). These two documents were published on the Scottish Government website on 17 June 2013 with responses to the consultation requested by 26 July 2013.
- 1.1.4 A [Consultation Analysis](#) was published in November 2013 and outlined the findings of the formal written comments sent in response to the consultation papers and an analysis of the findings of workshops and drop in sessions held in Kirkwall and Thurso during July 2013. The workshops and drop in sessions were organised in collaboration with researchers from the International Centre for Island Technology (ICIT) at Heriot Watt University who are working on a European Union funded project based on marine spatial planning.
- 1.1.5 There were 30 formal written responses received in relation to the Planning Issues and Options Consultation Paper and 6 in response to the draft Environmental Report. The workshops were attended by 34 participants in Kirkwall and 38 in Thurso and the evening drop in sessions were attended by approximately 24 and 30 people in Kirkwall and Thurso respectively.

1.2 Report Structure

- 1.2.1 This Consultation Report document outlines how the Working Group will take into account the findings of the consultation during the drafting of the Marine Spatial Plan and has been prepared using a combination of the methods used by Marine Scotland and the two local authorities for responding to consultations.
- 1.2.2 This Consultation Report deals with the responses received in relation to the Planning Issues and Options Consultation Paper only as the

responses in relation to the draft Environmental Report will be dealt with separately during the drafting of the final Environmental Report.

1.2.3 This document gives a brief summary of the main findings and outlines how these will be taken into account. This text is supported by a detailed annex that provides specific information against each comment received from the formal responses. The table in the annex provides a series of action points that will be used to inform the drafting of the Marine Spatial Plan.

1.2.4 This Consultation Report will be divided into the following sections:

- Section 1 (this section) provides an introduction to the report and background to the consultation documents,
- Section 2 provides a summary of the main findings of the Consultation Analysis and outlines how these will be taken into account,
- Annex 1 is a table that displays all the comments received and the response of the Working Group and outlines any actions that will be taken.

1.3 Report Availability and Distribution

1.3.1 This report has been compiled in line with Scottish Government and Local Authority best practice and has been made available to maximise the transparency of the decision making process.

1.3.2 The report will be made available on the Scottish Government consultations [website](#) and the pilot Pentland Firth and Orkney Waters Marine Spatial Plan [website](#).

1.4 Ongoing Consultation

1.4.1 Many of the formal responses to the consultation included an offer or request for further input into the process of drafting the Marine Spatial Plan.

1.4.2 The Working Group intend to have ongoing consultation with a wide range of stakeholders during the drafting process and will also continue to provide occasional updates *via* the stakeholder distribution list.

1.4.3 There is also an e-mailbox to which any queries can be sent: PFOWmarinespatialplan@scotland.gsi.gov.uk.

2. Summary of the Main Findings

2.1 Key Findings of Consultation Analysis

2.1.1 Detailed comments were provided to the consultation and there was wide ranging discussion of a variety of issues at the workshops and drop in sessions. The Consultation Analysis provides a summary of the points in relation to each of the questions contained within the consultation documents and the key findings are summarised below (in no order of priority):

- A clear vision and objectives for the Plan.
- Clear and consistent use of terminology and definitions and links to relevant Scottish Government work, plans and other relevant information.
- A very clear need for on-going consultation with a wide range of stakeholders.
- Clarity regarding what information will be used for the evidence base to inform the Plan.
- Respondents provided detailed comments in relation to the proposed policies.
- The need for a balanced and sustainable approach to planning.
- The Plan area should be based on the proposed Scottish Marine Regions Orkney and North Coast regions.
- The need for integration of marine and terrestrial planning.
- The need to ensure that existing legislation is taken account of and that the policies do not add unnecessary extra requirements.
- The need for an overarching spatial policy for the Plan.

2.2 Considerations for Draft Marine Spatial Plan

2.2.1 The Working Group will take into consideration the comments that have been received when drafting the Marine Spatial Plan and will also have ongoing consultation with a range of stakeholders during this process.

2.2.2 Annex 1 contains the action to be taken by the Working Group in relation to the detailed comments and a short summary will be given below of the main issues that the Working Group will consider when drafting the Marine Spatial Plan.

2.3 Clarity of text

2.3.1 The Working Group will ensure that the draft Plan uses terminology and definitions consistently, both within the text and also in relation to other Scottish Government documents. The links between the different Scottish Government documents and plans will be made clear in the draft Plan.

- 2.3.2 The draft Plan will also ensure that the vision and objectives are clear and that the baseline information used to inform the draft Plan is referenced within the text.
- 2.3.3 The Working Group will also ensure that the document is as concise as is possible whilst ensuring enough information is provided for clarity and transparency.
- 2.4 Consistency with current legislation
- 2.5 Area of the Marine Spatial Plan
- 2.5.1 The area that will be used for the Marine Spatial Plan will be based on the proposed Scottish Marine Regions for Orkney and the North Coast. The majority of the formal responses and feedback from the workshops supported alignment of the boundary of the draft Plan with the proposed Scottish Marine Regions.
- 2.5.2 The Working Group will consider how to take into account other Scottish Government plans such as the National Marine Plan and the Sectoral Plans for Wind, Wave and Tidal energy.
- 2.6 Integration between Marine and Terrestrial Planning
- 2.6.1 The Working Group has representatives from Marine Scotland, Highland Council and Orkney Islands Council to ensure that an integrated approach between terrestrial and marine planning systems can be achieved. The Marine Planning Partnerships will, once in place, be the decision making body that will ensure there is integration between terrestrial and marine planning systems in the Regional Marine Plans.
- 2.6.2 The Working Group will ensure that concerns regarding integration between the two planning systems are taken into account during the drafting of the text.
- 2.7 Vision, Aims, Objectives and Spatial Strategy
- 2.7.1 The Draft Plan will clearly outline the Vision, Aims and Objectives of the Draft Plan taking into account the comments received regarding sustainable development and also the cultural and social wellbeing of the local community.
- 2.7.2 This will be clearly linked to the overall Spatial Strategy and will include e.g. an indicative map showing key sensitivities, linkages and opportunities. The Working Group are considering the most effective method by which to include spatial data in the Draft Plan while also taking into account these data will need to be updated on a regular basis.

2.7.3 The Working Group are also considering methods by which to ensure the validity and quality of the information used to inform the baseline data and these will be outlined in the Draft Plan.

2.8 Policies within the Draft Plan

2.8.1 The Working Group has taken into account the comments received and has refined the list of policies contained within the Draft Plan. This has included re-ordering the policies to be consistent with the National Marine Plan.

2.8.2 The proposed draft **General Policies** will be:

- GEN 1 Sustainable development
- GEN 2 Supporting sustainable economic benefits
- GEN 3 The well-being and quality of life for coastal communities
- GEN 4 Safeguarding the natural environment
- GEN 5 Climate change
- GEN 6 Water environment
- GEN 7 Integrating coastal and marine development
- GEN 8 Nature conservation designations
- GEN 9 Protected species
- GEN 10 Wider biodiversity and geodiversity
- GEN 11 Invasive non-native species
- GEN 12 Landscape and seascape
- GEN 13 Historic environment
- GEN 14 Coastal processes and flooding
- GEN 15 Noise
- GEN 16 Waste management and marine litter
- GEN 17 Hazardous development and HSE Consultation Zones
- GEN 18 Defence

2.8.3 The proposed draft **Sectoral Policies** will be:

SEC 1 Commercial fisheries

- Safeguarding commercial fishing opportunities

SEC 2 Aquaculture

- Aquaculture (including seaweed cultivation and harvesting)

SEC 3 Oil and gas

- Safeguarding existing oil and gas infrastructure
- Oil and gas exploration and development
-

SEC 4 Renewable energy

- Marine renewable energy – Offshore wind, wave and tidal

SEC 5 Recreation, leisure and tourism

- Safeguarding coastal and marine recreation (activities, facilities and amenity)
- Recreation, leisure and tourism developments

SEC 6 Marine transport

- Operation and safety of shipping and navigation
- Safeguarding ferry services

SEC 7 Ports and Harbours

- Safeguarding existing ports and harbours
- Port and harbour development and infrastructure
- Dredging and disposal

SEC 8 Electricity and telecommunications infrastructure

- Safeguarding existing pipelines, electricity and telecommunication cables
- Electricity and telecommunications infrastructure

SEC 9 Marine aggregates

- Safeguarding marine aggregates resources
- Marine aggregates extraction

SEC 10 Coastal protection and flood defence

- Coastal protection and flood defence infrastructure

2.8.4 The Working Group intend to have ongoing dialogue to ensure the drafting of the policies takes into account the views and expertise of the relevant stakeholders.

2.9 Actions for the Working Group

2.9.1 Annex 1 contains a table that includes all the comments for which there was permission to make publicly available. Against each of the comments made the Working Group have listed the action that will be undertaken during the drafting of the Plan.

3. Annex 1 Table of Responses and Associated Working Group Actions

Key to abbreviations and acronyms contained within the table:

AIS	Automatic Identification System
AP	Action Point
ASP	Amnesic Shellfish Poisoning
CaSPlan	Caithness and Sutherland Local Development Plan
CBD	Convention on Biological Diversity
CNSRP	Caithness and North Sutherland Regeneration Partnership
COM	Communication from the Commission of the European Communities
COP	Convention of the Parties
CSO & EO	Combined Sewer & Emergency Overflows
DECC	Department of Energy and Climate Change
DSRL	Dounreay Site Restoration Ltd
EC	European Community
EIA	Environmental Impact Assessment
EMEC	European Marine Energy Centre
EMF	Electro-Magnetic Field
EMS	European Marine (Natura) Site
EU	European Union
FLOWW	Fishing Liaison with Offshore Wind and Wet Renewables Group
FTE	Full time equivalent
GCR	Geological Conservation Review
GDP	Gross Domestic Product
GEN	General Policies
GES	Good Environmental Status
GIS	Geographical Information System
GW	Gigawatt
HC	Highland Council
HIE	Highlands & Islands Enterprise
HRA	Habitats Regulations Appraisal
HS	Historic Scotland
HSE	Health and Safety Executive
IALA	International Association of Marine Aids to Navigation and Lighthouse Authorities
ICIT	International Centre for Island Technology
ICZM	Integrated Coastal Zone Management
IFG	Inshore Fisheries Group
IMO	International Maritime Organization
IMTA	Integrated Multi Trophic Aquaculture
INNS	Invasive Non-Native Species
LA	Local Authority
LDP	Local Development Plan

LNCS	Local Nature Conservation Sites
LORAN-C	Long Range Navigation
LOT	Licensing Operations Team
MCA	Maritime & Coastguard Agency
MEP	Marine Energy Park
MGN	Marine Guidance Note
MHWS	Mean High Water Springs
MIR	Main Issues Report
MLWS	Mean Low Water Springs
MMO	Marine Management Organisation
MPA	Marine Protected Area
MPP	Marine Planning Partnership
MPS	Marine Policy Statement
MS	Marine Scotland
MSFD	Marine Strategy Framework Directive
MSi	Marine Scotland Interactive
MS-LOT	Marine Scotland Licensing & Operations Team
MSP	Marine Spatial Plan
MSS	Marine Scotland Science
MV	Marine Vehicle
NGO	Non-Governmental Organisation
NLB	Northern Lighthouse Board
NM	Nautical Miles
NMP	National Marine Plan
NNS	Non-Native Species
NOREL	Nautical and Offshore Renewable Energy Liaison Group
NPF	National Planning Framework
NPF3	National Planning Framework 3
NRIP	National Renewables Infrastructure Plan
NSA	National Scenic Area
O&M	Operations and Maintenance
OFA	Orkney Fisheries Association
OIC	Orkney Islands Council
ONS	Office of National Statistics
OSPAR	The Convention for the Protection of the marine Environment of the North-East Atlantic (the "OSPAR Convention")
OTFA	Orkney Trout Fishing Association
PF	Pentland Firth
PFOW	Pentland Firth and Orkney Waters
PFOWLF	Pentland Firth and Orkney Waters Leadership Forum
PFOWMSP	Pentland Firth and Orkney Waters Marine Spatial Plan
PFYC	Pentland Firth Yacht Club
PIOP	Planning Issues and Options Consultation Paper
PMF	Priority Marine Features
PP	Proposed Policy
PPO	Proposed Policy Option
RAF	Royal Air Force

RLG	Regional Locational Guidance
RMP	Regional Marine Plan
RNLI	Royal National Lifeboat Institute
RPP2	Report on Proposals and Policies 2
RSPB	Royal Society for the Protection of Birds
RYA	Royal Yachting Association
RYAS	Royal Yachting Association Scotland
SA	Strategic Area
SAC	Special Area of Conservation
SANAP	Strategic Area Navigation Appraisal Project
SD	Sustainable Development
SDM	Survey, Deploy, Monitor
SE	Scottish Enterprise
SEA	Strategic Environmental Assessment
SEC	Sectoral Policies
SEGEC	Scottish European Green Energy Centre
SEPA	Scottish Environment Protection Agency
SFA	Scottish Fishermen's Association
SFF	Scottish Fishermen's Federation
SG	Scottish Government
SMR	Scottish Marine Region
SMRRG	Scottish Marine Renewables Research Group
SNH	Scottish Natural Heritage
SOLAS	International Convention for the Safety of Life at Sea
SPA	Special Protection Area
SPP	Scottish Planning Policy
SPR	Scottish Power Renewables
SPS	Seaweed Policy Statement
SSMEI	Scottish Sustainable Marine Environment Initiative
SSPO	Scottish Salmon Producers Organisation
SSSI	Site of Special Scientific Interest
STS	Sail Training Shetland
TCE	The Crown Estate
UK	United Kingdom
UNCLOS	United Nations Convention on the Law of the Sea
WDC	Whale Dolphin Conservation
WEWS	Water Environment and Water Services
WHS	World Heritage Site
WWTW	Waste Water Treatment Works

Question 1. Are there other legislation, policies or plans not identified in Table 4.1 and Annex 3 that should be considered in the development of the Pilot Pentland Firth and Orkney Waters Marine Spatial Plan?

Response Number* /Organisation	Respondents comments	Response
1 Marine Biopolymers	I don't think there is anything missing as such – it is a long and bewildering list, but the point I want to make is that within the context of all plans, then some space or consideration needs to be include or made available in respect of Seaweed, whether natural stocks of, or cultivated. Seaweed, and particularly its exploitation via e.g. harvesting could be seen as a bit of a “grey area”.	Noted. The relevant section of the Draft Plan will be modified to improve clarity and be more comprehensive. AP1: Seaweed will be considered under the aquaculture sector of the Draft Plan.
2 Pentland Firth Yacht Club	Not that we are aware of.	Noted.
4 Orkney Fisheries Association	Individual and collective well being as measured by the ONS [Office of National Statistics]	Noted. This will be considered in the development of the Draft Plan. AP2: A Quality of Life / Well Being policy section will be developed in the Draft Plan.
5 Scottish Natural Heritage	We are generally content with this list, but refer you to our response of 15 th February to the SEA scoping report in which we detailed some additional regional/local policies relevant to consideration of landscapes/seascapes and coastal zone development.	Noted. The additional information will be taken into account in the development of the Draft Plan.
6 Scottish Environment Protection Agency	We are content that the Table and Annex covers nearly all the relevant legislation, policies or plans in relation to our interests. While reference to the Water Framework Directive and Water Environment and Water Services (WEWS) Act is included, we note that River Basin Management Planning is not explicitly included in the Table of Annex; however we are sure you will consider this information as part of the plan-making process. As minor issues in relation to page 118 we highlight that shellfish waters and bathing waters are not water bodies and in relation to WEWS on page 119, reference should be made to ecological status rather than environmental status. We could not find reference to the Aquaculture and Fisheries (Scotland) Act 2013, which you may also wish to consider.	Noted. AP3: River Basin Management Planning will be included in the sections of the Draft Plan that deal with legislative requirements and the Water Environment policy.

Question 1. Are there other legislation, policies or plans not identified in Table 4.1 and Annex 3 that should be considered in the development of the Pilot Pentland Firth and Orkney Waters Marine Spatial Plan?

Response Number* /Organisation	Respondents comments	Response
7 Pentland Canoe Club	No comments.	N/A
8 Scottish Water	<p>Scottish Water welcomes the approach taken by the Plan to ensure stakeholder involvement, we are committed to working in partnership to assist in the development and management of marine planning. We note that it will be important for any key elements of the plan to take cognisance of Scottish Water’s regulatory structure and financing in the event that there are specific measures identified for the water industry.</p> <p>Scottish Water believes that the Marine Spatial Plan should be set in the context of the overall sustainable development of Scotland and must take socio-economic aspects into account at the policy development stage.</p>	<p>Noted.</p> <p>Noted. This will be considered in the development of the Draft Plan.</p>
9 Caithness Kayak Club	The rights of navigation need a sharp focus. As in land access with the Land Reform Act, then “responsible access” is a key element	Noted. We agree that navigation is a key issue and the Draft Plan will contain a section on shipping, navigation and marine safety which will take into consideration the relevant legislation.
10 Individual	No.	N/A
12 Orkney Sustainable Fisheries Ltd.	Individual and collective well being as measured by the ONS [Office of National Statistics]	<p>Noted. This will be considered in the development of the Draft Plan.</p> <p>AP4: A Quality of Life / Well Being policy section will be developed in the Draft Plan.</p>
13 Royal Yachting Association	No.	N/A
14 Orkney Sea Kayak Association	We would like to see Proposed Policy 21 split into two separate policies, Tourism as one and Recreation as another. We believe this would better safeguard the needs of recreational marine users. Existing policy which could guide a Recreation Policy includes the Scottish Planning Policy Open Spaces & Physical Activity paragraphs 149 & 150 as referred to in p.16 of the Planning Issues and options Consultation Paper.	Noted. This will be addressed in the Draft Plan. Consideration will be given to having two policies, one each for Tourism and Recreation. Further information will be provided by the Tourism and Recreation case study.

Question 1. Are there other legislation, policies or plans not identified in Table 4.1 and Annex 3 that should be considered in the development of the Pilot Pentland Firth and Orkney Waters Marine Spatial Plan?

Response Number* /Organisation	Respondents comments	Response
	<p>p.117 Annex 3. Bathing Water Directive 2006 should be amended to say : ‘Bathing water quality is a key consideration, particularly in key surfing, windsurfing and paddlesport areas in the pilot PFOW MSP area’.</p>	<p>AP5: Develop separate tourism and recreation policy sections.</p> <p>Noted. The relevant section of the Draft Plan will be modified to improve clarity and be more comprehensive.</p> <p>AP6: Ensure definitions in relation to recreational activities are accurate e.g using the term “surfing, windsurfing and paddlesport”.</p>
<p>15 Kirkwall Kayak Club</p>	<p>Existing policy which could guide a Recreation Policy (see PPO Response Box 6) includes the Scottish Planning Policy Open Spaces & Physical Activity paragraphs 149 & 150 as referred to in p.16 of the Planning Issues and options Consultation Paper.</p> <p>p.117 Annex 3. We also suggest an addition of “paddlesport” to the Key Environmental Objectives in Bathing Water Directive 2006 i.e. Bathing water quality is a key consideration, particularly in key surfing <u>and paddlesport</u> areas in the pilot PFOW MSP area”.</p>	<p>Noted.</p> <p>Noted. The relevant section of the Draft Plan will be modified to improve clarity and be more comprehensive.</p> <p>AP7: Ensure definitions in relation to recreational activities are accurate e.g using the term “surfing, windsurfing and paddlesport”.</p>
<p>16 SportsScotland</p>	<p>Please see link to our policy document on sport and recreation in the outdoors. While not written specifically for the marine environment a number of generic policy areas are relevant. http://www.sportscotland.org.uk/resources/Out_There</p>	<p>Noted. Added to list of information sources.</p>
<p>17 The Crown Estate</p>	<p>The Planning Issues and Options paper includes a comprehensive list of relevant legislation, plans and policies but in addition to the National Marine Plan, we would recommend that reference is also made to the process currently underway to designate a network of Marine Protected Areas in Scotland’s seas.</p>	<p>Noted.</p> <p>AP8: Ensure reference is made to plans to designate a network of Marine Protected Areas in</p>

Question 1. Are there other legislation, policies or plans not identified in Table 4.1 and Annex 3 that should be considered in the development of the Pilot Pentland Firth and Orkney Waters Marine Spatial Plan?

Response Number* /Organisation	Respondents comments	Response
	<p>We welcome the inclusion of schematic diagrams (Figures 3 and 4) to help explain how the plan sits alongside other relevant plans and policies. We would suggest that additional narrative is developed to help explain the relationship between these plans further. For example, does the sectoral plan for wave energy <i>inform</i> the future development of wave energy within the PFOW as identified in the plan?</p>	<p>the Nature Conservation Designations section.</p> <p>Noted. The relevant section of the Draft Plan will be modified to improve clarity and be more comprehensive.</p> <p>AP9: Ensure the relationship between the Draft Plan and other plans and policies is clear.</p>
19 RSPB	No comments.	N/A
20 Highland Council	<p>The Highland Council has recently begun preparation of the Caithness and Sutherland Local Development Plan, which will be relevant; we anticipate publishing the Main Issues Report in early 2014. For the time being, reference should be made to the Caithness Local Plan (2002) and the Sutherland Local Plan (2010) both “As continued in force (2012)”. All of these documents should be added in to Table 4.1.</p> <p>Noting that Table 4.1 includes the Orkney Local Biodiversity Action Plan, it would be appropriate to add in reference to the Highland Biodiversity Action Plan, Caithness Biodiversity Action Plan and Sutherland Biodiversity Action Plan.</p> <p>The Marine Spatial Plan should therefore be prepared in a way that is consistent between the two Council areas.</p> <p>We assume that it is not intended to include within Table 4.1 various Supplementary Guidance documents of the two Councils; these documents are referred to in the Local Development Plans which are in the table already. However, if you wish to add in</p>	<p>AP10: The relevant section of the Draft Plan will be modified to improve clarity and be more comprehensive. Consideration of the appropriate Local Development Plans will be given at the time of drafting. We will address this in Policy 2A Integrating Marine and Coastal Development.</p> <p>Noted. The relevant section of the Draft Plan will be modified to improve clarity and be more comprehensive.</p> <p>Noted. The Draft Plan will take into account the work of both Highland Council and Orkney Islands Council.</p> <p>Noted. The relevant tables will be modified where appropriate.</p>

Question 1. Are there other legislation, policies or plans not identified in Table 4.1 and Annex 3 that should be considered in the development of the Pilot Pentland Firth and Orkney Waters Marine Spatial Plan?

Response Number* /Organisation	Respondents comments	Response
	<p>Supplementary Guidance documents, we would be happy to assist in identifying those most relevant.</p> <p>The Caithness & North Sutherland Regeneration Partnership (CNSRP - of which The Highland Council is a partner) works on a three-year Delivery Plan, and a Vision for the area in 2020. Both of these documents would be relevant to the Plan. See www.cnsrp.org.uk</p>	Noted. This will be taken into consideration in the drafting the plan.
21 Scottish Renewables	Reference should be made to the Scottish Government's Offshore Wind and Marine Energy Route Maps, and the Electricity Generation Policy Statement.	Noted. This will be taken into consideration in the drafting the plan.
22 Scottish Wildlife Trust	Common Fisheries Policy, OSPAR Convention, Climate Change (Scotland) Act	Noted. This will be taken into consideration in the drafting the plan.
23 Scottish Power Renewables	<p>Question 1, Page 18</p> <p>Other potential plans that may well need to be taken into account include the current consultation on the MPA coherent network, other plans for expansion of European designated sites (i.e. additional SPA designations) and also the PF Marine Energy Park (as mentioned in the introduction on Page 5).</p>	Noted. This will be taken into consideration in the drafting the plan.
24 Orkney Renewables Energy Forum	None apparent. It is welcomed that the Proposed Orkney Local Development Plan is identified as being considered as this will no doubt form a key material consideration in the determination of the on-shore infrastructure / buildings required to serve the marine renewables development in Orkney.	Noted.
25 Scottish Salmon Producers Organisation	<p>Yes</p> <p>(i) Town and Country Planning (Scotland) Act 1997 as amended by the Planning etc. (Scotland) Act 2006.</p> <p>(ii) "A Fresh Start" The Renewed Strategy for Aquaculture in Scotland.</p> <p>(iii) The Scottish Governments Food Strategy.</p> <p>(iv) Building a sustainable future for aquaculture - EC COM(2009)162</p> <p>(v) Scotland's National Marine Plan consultation Draft</p>	Noted. This will be taken into consideration in the drafting the plan.

Question 1. Are there other legislation, policies or plans not identified in Table 4.1 and Annex 3 that should be considered in the development of the Pilot Pentland Firth and Orkney Waters Marine Spatial Plan?

Response Number* /Organisation	Respondents comments	Response
26 Orkney Trout Fishing Association	Comments in Question 19 box.	Noted.
27 Colin Kirkpatrick	Comments in Question 19 box.	Noted.
28 Carol Breckenridge	No comments	N/A
29 Highlands and Islands Enterprise	Reference should be made to the Scottish Government's Offshore Wind and Marine Energy Route Maps, otherwise HIE cannot identify any other legislation, policies or plans not identified in table 4.1 and annex 3.	Noted. This will be taken into consideration in the drafting the plan.
30 Dounreay Site Restoration Ltd.	Comments in Question 19 box.	Noted.
32 Scottish Fishermen's Association	It remains a matter of concern to the SFF that there is no National Plan or Policy for commercial fishing which could be used in the development of the PFOWMSP.	Noted.

*Responses number 3 and 31 were in relation to the draft Environmental Report and are not included here. Response number 11 cannot be made public as a Respondent Information Form was not received and number 18 was from an individual that did not give permission to make their response public.

Question 2. Is there other information that you think should be used to inform the development of the marine spatial plan for Pentland Firth and Orkney Waters?

Response Number*	Response Summary	Working Group Response
1 Marine Biopolymers	See comment above – information about natural seaweed stocks and/or the adoption, and implications of (e.g. in sea area use terms), cultivated seaweed, often called Mariculture (this would be with a future horizon of say 10 years), should be included. As far as natural seaweed stocks are concerned, Orkney has probably the best and most concentrated stocks, within a finite area, in the whole of the British Isles. Going back 200 years, there was a substantial seaweed using industry on Orkney – that has long since gone, but the seaweed is still there and it is currently completely unexploited.	Noted. This will be considered in the development of the Draft Plan. AP11: Seaweed will be considered under the aquaculture sector of the Draft Plan.
2 Pentland Firth Yacht Club	The strategy addresses environment, commercial / tourism exploitation and leisure use (generally from a revenue perspective) but does not seem to have a category relating to Local Amenity Use by residents.	AP12: The relevant section of the Draft Plan will be modified to include a Quality of Life / Well Being policy section and recreation policy section, which will help support local amenities.
4 Orkney Fisheries Association	The development of a comprehensive pilot marine spatial plan should also be based on an understanding of the locations of spawning and nursery grounds for Orkney’s key commercial shellfish species. This is currently a critical gap in knowledge which places the sustainability of Orkney’s fisheries at risk from marine developments.	Noted. A key aim of the Plan is to minimise risk to marine users in an environment of increasing development. AP13: This gap in knowledge is noted and the Working Group will ensure that the results of research being carried out by Marine Scotland Science to map these areas are taken into account.
5 Scottish Natural Heritage	As highlighted in our response to the SEA Environment Report, we are concerned that insufficient reference is being made in the development of this Plan to the considerable wealth of information about the environment, and in particular biodiversity of the Plan area. Key aspects that should be included are: locations of seal breeding sites; use of the area by cetaceans; use of the area by breeding seabirds and wintering waterfowl; locations of proposed Marine Protected Areas; and, occurrence of Priority Marine Features. We have previously provided advice to the Working Group ¹ on key data sources with respect to these interests and are happy to assist further.	These concerns are noted and the Working Group will include the suggested references. AP14: The Working Group will include the suggested references and work with SNH to ensure their concerns are addressed. Many of these issues will be covered under the relevant Draft Plan sections, <i>National Marine Plan Interactive</i> and the Environmental Report.

¹ Including at the “Planning for the Edge” Workshop on 4th May 2012 and at a meeting with James Green on 21st June 2012 as well as in subsequent e-mails.

Question 2. Is there other information that you think should be used to inform the development of the marine spatial plan for Pentland Firth and Orkney Waters?

Response Number*	Response Summary	Working Group Response
	Please also see our comments on the development of a landscape and seascape policy (response box 5)	Noted.
6 Scottish Environment Protection Agency	Through previous engagement we have already provided you with all the information we consider is relevant but please feel free to approach us if you consider there is other information we hold which may be helpful.	Noted.
7 Pentland Canoe Club	No comments.	N/A
8 Scottish Water	<p>We consider that measures must be evidence based, proportionate and underpinned by scientific assessment.</p> <p>The location and static nature of our coastal assets is often supported by marine dispersion modelling, and it should be recognised that the mixing zones for final effluent discharges may not be compatible with certain other activities.</p> <p>It should be considered what size/level of activity it is necessary to record to inform a regional marine plan e.g. in Scottish Water's case, we would ask, would it be at same level as provided for the Scottish Marine Atlas?</p> <p>Consideration may need to be given to finding a balance between disclosures of asset positions and protection of those assets.</p>	<p>The Draft Plan will be evidenced based and, where evidence is not available or limited, this will be made clear.</p> <p>Noted. This will be considered in the Draft Plan.</p> <p>This will be considered in the Draft Plan and your comments taken into account.</p> <p>Noted. This will be considered when developing the Draft Plan.</p>
9 Caithness Kayak Club	<p>Kayaking in these waters is a regular, but not well known, activity. Groups have had traditional access at small beaches and harbours which needs to be maintained.</p> <p>Groups on the water in Pentland Firth and Orkney waters include local clubs on day trips, organised parties on multi-day expeditions, Glenmore Lodge National Centre groups, and round Britain kayakers.</p>	<p>Noted. This will be considered in the Draft Plan. Information will be collected during the Tourism and Recreation.</p> <p>Noted.</p>

Question 2. Is there other information that you think should be used to inform the development of the marine spatial plan for Pentland Firth and Orkney Waters?

Response Number*	Response Summary	Working Group Response
	These activities have been taking place for 40 years, co-existing with other users of the waters.	Noted. A key aim of the Draft Plan is to minimise risk to marine users in an environment of increasing development.
10 Individual	No comments.	N/A
12 Orkney Sustainable Fisheries Ltd.	<p>The development of a comprehensive pilot marine spatial plan should also be based on an understanding of the locations of spawning and nursery grounds for Orkney's key commercial shellfish species. Further work also needs to be done to attempt to understand the tidal distribution of crustacean and bi-valve mollusc larvae during their free floating stage. This is currently a critical gap in knowledge which places the sustainability of Orkney's fisheries at potential risk from the deployment of marine energy devices.</p> <p>Orkney Sustainable Fisheries Ltd is currently engaged on a 4 year research project using Succorfish to track fishing patterns and movement of inshore fishery vessels. This is a well-resourced project with academic rigor and the outputs should have a bearing on how the PFOW pilot progresses. This type of project should be used to inform the MSP process (both in Pentland Firth and if there is a role out to other areas).</p>	<p>Noted. A key aim of the Plan is to minimise risk to marine users in an environment of increasing development.</p> <p>AP15: This gap in knowledge is noted and the Working Group will ensure that the results of research being carried out by Marine Scotland Science to map these areas are taken into account.</p> <p>Noted. The results of this work will be taken into account during the development of the Draft Plan.</p> <p>AP16: Ensure the results of the Succorfish project are taken into account in the development of the Draft Plan.</p>
13 Royal Yachting Association	None that we are aware of.	Noted.
14 Orkney Sea Kayak Association	<p>The forthcoming study on Tourism and Recreation is welcomed which we hope will address the identified knowledge gaps regarding recreational marine use in the PFOW, and look forward to being involved in the consultation as part of this.</p> <p>It needs to be noted the quality of life benefits through recreation, particularly in remote coastal and rural areas such as Orkney, Caithness and Sutherland, cannot easily be measured and certainly we believe is not quantifiable in the same manner or correlates to economic measures already used.</p>	<p>Noted. This project will involve consultation with interested stakeholders and the Working Group will keep you informed as to progress.</p> <p>AP17: Ensure that relevant stakeholders are consulted as part of the study on Tourism and Recreation.</p> <p>AP18: A Quality of Life / Well Being policy section will be developed in the Draft Plan.</p>

Question 2. Is there other information that you think should be used to inform the development of the marine spatial plan for Pentland Firth and Orkney Waters?

Response Number*	Response Summary	Working Group Response
15 Kirkwall Kayak Club	<p>We look forward to being involved in the consultation as part of the forthcoming study on Tourism and Recreation which we hope will address the identified knowledge gaps regarding recreational marine use in the PFOW, which we understand is due for completion at the end of 2013.</p> <p>We also put forward that the enhancement to quality of life through recreation, particularly in remote coastal and rural areas such as Orkney, Caithness and Sutherland, cannot easily be measured and certainly we believe is not quantifiable in the same manner or is necessarily correlated to economic measures of quality of life.</p>	<p>Noted. This project will involve consultation with interested stakeholders and the Working Group will keep you informed as to progress.</p> <p>AP19: Ensure that relevant stakeholders are consulted as part of the study on Tourism and Recreation.</p> <p>AP20: A Quality of Life / Well Being policy section will be developed in the Draft Plan.</p>
16 SportsScotland	<p>We are working with RYAs on the development of their Facilities Strategy. Part of this work has involved an audit of all sailing facilities in Scotland, including for the Pentland Firth. RYAs would be happy to share this information with you to inform work in this area.</p>	<p>Noted. This information would be useful to develop the Draft Plan.</p> <p>AP21: Contact Royal Yachting Association Scotland to request information on sailing facilities in Scotland.</p>
17 The Crown Estate	<p>No further information at present.</p>	<p>Noted.</p>
19 RSPB	<p>No comments.</p>	<p>N/A</p>
20 Highland Council	<p>The Marine Spatial Plan should be informed not only by existing activities but also by those that are being planned. This includes, for example, current proposals for energy developments, electricity grid and ports/harbours which have yet to be built. It is noted that within the accompanying Environmental Report a number of assumptions have been made about planned developments going ahead (e.g. see paragraph 4.4 of the Environmental Report).</p> <p>Additional information that may be relevant to take into account could include</p>	<p>Noted. The relevant section of the Draft Plan will be modified to improve clarity and be more comprehensive.</p> <p>Noted. These sources of information will be consulted and, if appropriate, used to inform the development of</p>

Question 2. Is there other information that you think should be used to inform the development of the marine spatial plan for Pentland Firth and Orkney Waters?

Response Number*	Response Summary	Working Group Response
	<p>Landscape Character Assessments (SNH), landscape capacity studies (by/for Councils e.g. to inform Onshore Wind Energy Supplementary Guidance) and citations relating to local/regional landscape designations (by/for Councils e.g. Highland's Special Landscape Areas). These may be able to inform the plan at a strategic issues and strategy level, rather than just informing consideration of individual proposals. See also our response in respect of Proposed Policy 3E (Landscape and Seascape).</p> <p>A further document that may be useful to refer to is The Crown Estate's "Pentland Firth and Orkney waters onshore infrastructure information note", and indeed other projects and publications under TCE's 'enabling actions' which are available at: http://www.thecrownestate.co.uk/energy-infrastructure/wave-and-tidal/pentland-firth-and-orkney-waters/enabling-actions/projects-and-publications/</p> <p>The Caithness & North Sutherland Regeneration Partnership works on a three-year Delivery Plan and a Vision for the area in 2020. Both of these documents would be relevant to the Plan. See www.cnsrp.org.uk</p>	<p>the Draft Plan.</p> <p>AP22: Consider whether these sources of information could contribute useful information to the Draft Plan.</p> <p>Noted. These publications will be consulted.</p> <p>AP23: Consider whether these sources of information could contribute useful information to the Draft Plan.</p> <p>Noted. These publications will be consulted.</p> <p>AP24: Consider whether these sources of information could contribute useful information to the Draft Plan.</p>
21 Scottish Renewables	<p>There is a huge volume of research which could help with the development of the plan beyond the stage 2 studies. The paper states further information can be found in section 15 yet there does not appear to be a section 15. Inclusion of a full list of the data sets used to develop the plan would be useful.</p> <p>In the absence of a full list of data sets used it is not possible to give a detailed answer to consultation question 2, however, we suggest studies listed in the Scottish Marine Renewables Research Group's Detailed Environmental Research Programme may be of use.</p> <p>It should also be recognised that the Scottish Government's survey, deploy and monitor policy technically remains in draft form, and the draft Marine Renewable Licensing Manual sets the context for the SDM policy.</p>	<p>This information was moved to section 14 but the updates to the references in the text were missed in the editing of the document.</p> <p>AP25: Include an updated list of data sources used to develop the Draft Plan.</p> <p>Noted. Work on these documents is ongoing and will be taken into consideration during the development of the Draft Plan.</p>

Question 2. Is there other information that you think should be used to inform the development of the marine spatial plan for Pentland Firth and Orkney Waters?

Response Number*	Response Summary	Working Group Response
		<p>AP26: The ongoing work on the survey, deploy and monitor policy and the draft Marine Renewable Licensing Manual will be taken into account during the development of the Draft Plan.</p>
22 Scottish Wildlife Trust	No comments.	N/A
23 Scottish Power Renewables	<p>Question 2, Page 21</p> <p>No mention is made of other external and internal sources of data. Ongoing works are being undertaken by developers and The Crown Estate within the PFOW SA, which may be or become available. Additionally, Marine Scotland has undertaken extensive cruises of the PFOW SA gathering geophysical, drop-down camera and sub bottom profiling data – all of which should be taken into account within the Draft Plan.</p>	<p>Noted. Table 5.1 on page 21 is referring specifically to stage 2 studies carried out by Marine Scotland to address knowledge gaps to inform the development of the Draft Plan. A comprehensive list of data sources are provided in Table 4.1 and Annex 3 of the SEA Scoping and Screening Report. This will be updated in the Draft Plan.</p> <p>AP27: Include an updated list of data sources used to develop the Draft Plan.</p>
24 Orkney Renewables Energy Forum	<p>There is a danger that the on-shore elements that will be required to support marine renewables in Orkney have not formed the basis of any study report cited in this plan. Aside from a single mention in one policy (SD6) of the Proposed Orkney Local Development Plan, there doesn't appear to have been much work done in this area. It is hoped that this will not impact on development progress if the on-shore elements are to experience delay in the planning consenting process as a result of this.</p>	<p>Noted. Planning guidelines for the development of onshore infrastructure will be dealt with under relevant Local Development Plans and Supplementary Guidance where appropriate. The integrating coastal and marine development policy in the Draft Plan will help ensure that the assessment of onshore and offshore development is co-ordinated.</p> <p>AP28: The relevant section of the Draft Plan will be modified to improve clarity and be more comprehensive.</p>

Question 2. Is there other information that you think should be used to inform the development of the marine spatial plan for Pentland Firth and Orkney Waters?

Response Number*	Response Summary	Working Group Response
25 Scottish Salmon Producers Organisation	<p>The presumption against all marine fin fish farming on the north and east coasts of Scotland has no scientific basis or other justification and is outdated on any basis of logic. It derives from a policy decision based on Recommendation 61 of the Report of the Scottish Salmon Strategy Task Force (1997). That recommendation was made at a time when there were limited planning controls on fish farm development and it advised a precautionary position until such controls were instituted. Planning controls are now in place and it is illogical to prohibit the farming of all species of finfish. If the PFOWMSP is to truly support the growth of finfish aquaculture it must have a more appropriate policy which reflects the advances in fish farming technology, and in fish husbandry, already achieved over the past 20 years and those likely to be achieved within the plan period.</p> <p>(See also the SSPO comments on the Scottish Planning Policy and the National Planning Framework Main Issues Report.)</p>	Noted. The Draft Plan will be developed in line with current legislation, policy and guidance. The presumption against all marine fin fish farming on the north and east coasts of Scotland is an issue for Scottish Planning Policy and was also part of the National Marine Plan consultations and any representations in this regard made through the appropriate consultation processes will be taken into account.
26 Orkney Trout Fishing Association	Comments in Question 19 box.	Noted.
27 Colin Kirkpatrick	Comments in Question 19 box.	Noted.
28 Carol Breckenridge	Risk to diving sea birds and special importance of nesting peregrines on Dunnet Head.	Noted. Dunnet Head is part of the designated North Caithness Cliffs Special Protection Area (SPA). The designation covers aggregations of breeding birds for a number of species, including the Peregrine falcon (<i>Falco peregrinus</i>) and several diving species. Any development would therefore have to take this into careful consideration.
29 Highlands and	The paper states further information can be found in Section 15 however there does not seem to be a section 15 attached. It is difficult to give an answer in	Noted. This information was moved to section 14 but the updates to the references in the text were missed in the

Question 2. Is there other information that you think should be used to inform the development of the marine spatial plan for Pentland Firth and Orkney Waters?

Response Number*	Response Summary	Working Group Response
Islands Enterprise	respect of not knowing what has already been used. HIE have recently commissioned Caelulum to review existing data and reports relating to economic impacts associated with development of the marine renewables sector and have a summary description setting out the importance of the growth of the sector and long term economic opportunities it offers to the UK. HIE are in a position to share this with Marine Scotland should you see fit.	editing of the document. AP29: Obtain the summary description from HIE.
30 Dounreay Site Restoration Ltd.	Comments in Question 19 box.	Noted.
32 Scottish Fishermen's Association	In addition to Scotmap data on fishing operations, the developers should take advice from MSS as to fish and shellfish spawning grounds, nursery areas and other potential areas of aggregation of fish stocks.	Noted. A key aim of the Plan is to minimise risk to marine users in an environment of increasing development. AP30: This gap in knowledge is noted and the Working Group will ensure that the results of research being carried out by Marine Scotland Science to map these areas are taken into account.

*Responses number 3 and 31 were in relation to the draft Environmental Report and are not included here. Response number 11 cannot be made public as a Respondent Information Form was not received and number 18 was from an individual that did not give permission to make their response public.

Question 3. Considering paragraph 6.5, are there other stakeholder engagement and governance related issues that should be investigated through the pilot marine planning process?

Response Number*	Response Summary	Working Group Response
1 Marine Biopolymers	I think that all the possible frameworks are in place, but please simply consider all aspects that have relevance in terms of Orkney & Pentland resources – make sure the scope includes all meaningful resources - back to the point on seaweed.	Noted.
2 Pentland Firth Yacht Club	No. It appears that a great deal of effort has gone into including as many stakeholders as practicable. The PFYC may comment on some issues that benefit other stakeholders to ensure all interests are considered.	Noted. The Working Group welcomes the positive feedback on stakeholder engagement.
4 Orkney Fisheries Association	<p>Emphasis should be placed on identifying and addressing potential barriers to participation for different stakeholder groups.</p> <p>A comprehensive stakeholder analysis conducted early on in the planning process could be useful in determining opportunities for improving relationships between certain stakeholder groups. This would facilitate progress towards a common vision for the sustainable development of the PFOW.</p> <p>It will be useful to establish definitions for the roles and responsibilities of the Working Group, Advisory Group, statutory and non-statutory stakeholders and the wider public to avoid any mismatches between expectations for participation and outcomes.</p> <p>Further to that, linear and discrete identification of ‘stakeholder’ can be too narrow in an island context where social, economic and identity boundaries are blurred and much more holistic in nature. Many islanders have multi-faceted roles within their communities and are part of other contexts as well as their</p>	<p>Noted. Stakeholder engagement is a vital part of the process of developing the Draft Plan.</p> <p>Noted. Stakeholder engagement is a vital part of the development of the Draft Plan and the Working Group has consulted on an individual and wider basis throughout the process. The consultation events to date i.e. the workshops, evening drop in sessions and the opportunity for one to one meetings were widely advertised and provided many opportunities to discuss the development of the Draft Plan. There will be sector specific focus groups as required to work through development of policy for the Draft Plan.</p> <p>AP31: An updated schematic (Figure 2 in PIOP) will be provided to show the links between the different groups involved in developing the Draft Plan.</p> <p>AP32: Ensure that opportunities for stakeholder engagement are provided at all stages of the development of the Draft Plan. Update the Plan Scheme timetable outlining when consultation will take place and</p>

Question 3. Considering paragraph 6.5, are there other stakeholder engagement and governance related issues that should be investigated through the pilot marine planning process?

Response Number*	Response Summary	Working Group Response
	<p>professional definitions. A fisherman can have several stakeholder interests, as an exploiter of the sea for its wild stocks, a lover of the environment, a part-time earner from tourism, and as some-one who appreciates natural and wild beauty. Many islanders would consider themselves as defined by their occupation but also their multi- faceted 'islandness'.</p>	<p>ensure this information is made available to stakeholders.</p>
5 Scottish Natural Heritage	<p>The proposed topics are all very relevant and potentially valuable to the process of learning lessons on stakeholder engagement. Explicit consideration might also be given to how other statutory consultees activities (e.g. with respect to TCE and leasing rounds and to HIE and National Renewables Infrastructure Plan (NRIP) sites) are informed by or inform the Plan. We would suggest that when considering and analysing the lessons to be drawn within these broad topics particular consideration be given to the differing capacity and constraints issues that may affect various types of stakeholders (e.g. statutory consultees, commercial bodies, and voluntary and community groups) and to the optimal timing for inputs from these groups within the planning process. Consideration of these issues should help to inform future resource needs for regional marine planning, in terms both of team structures and expertise and time allowed for plan development.</p>	<p>Noted. Consideration will be given to how and when statutory consultees are consulted to ensure that the most efficient process possible is developed.</p> <p>AP33: Consider how and when best to consult stakeholders and ensure that lessons learned are recorded to inform future resource needs for regional marine planning.</p>
6 Scottish Environment Protection Agency	<p>Through previous engagement we have already provided you with all the information on other stakeholders which we consider may be relevant.</p>	<p>Noted.</p>
7 Pentland Canoe Club	<p>No comments.</p>	<p>N/A</p>
8 Scottish Water	<p>Scottish Water has no comment</p>	<p>Noted.</p>
9 Caithness Kayak Club	<p>See above.</p>	<p>Noted.</p>

Question 3. Considering paragraph 6.5, are there other stakeholder engagement and governance related issues that should be investigated through the pilot marine planning process?

Response Number*	Response Summary	Working Group Response
10 Individual	With regard to marine recreation and tourism we have far too little knowledge. The Anatec report shows tracks obtained from AIS. This however is only 17% of the total movements and is mainly from the large sail training vessels. We need to know where the majority are coming from and eventually going to; the weather they had on passage; did they have any navigational problems; do they know about all the changes that have taken place in the seas in the PFOW; are their charts up to date including the electronic ones plus many other items. All this needs to be tabulated over a period of two to three years and it is only then will we know what mitigation needs to take place.	Noted. The proposed Tourism and Recreation study will aim to collect data to improve knowledge for marine recreation and tourism. Although not all the suggested data listed will be collected, the study will provide an improved data set to inform the Draft Plan. AP34: Ensure, where feasible, the proposed Tourism and Recreation study provides information to fill current data gaps.
12 Orkney Sustainable Fisheries Ltd.	Emphasis should be placed on identifying and addressing potential barriers to participation for different stakeholder groups. It is very difficult to get effective engagement with inshore fishermen due to the nature of their work and their employment “philosophy”. Contributions from representative organisations should not be taken as a definitive reflection of individual views.	Noted. Stakeholder engagement is a vital part of the development of the Draft Plan and the Working Group has consulted on an individual and wider basis throughout the process. The consultation events to date i.e. the workshops, evening drop in sessions and the opportunity for one to one meetings were widely advertised and provided many opportunities to discuss the development of the Draft Plan. There will be sector specific focus groups to work through development of policy for the Draft Plan. AP35: Ensure that opportunities for stakeholder engagement are provided at all stages of the development of the Draft Plan. Update the Plan Scheme timetable outlining when consultation will take place and ensure this information is made available to stakeholders.
13 Royal Yachting Association	Although the shipping study was able to draw on the experience of many recreational boating stakeholders, some such stakeholders live outside the UK. The RYA through RYA Scotland can represent UK domiciled boaters but not visitors from Scandinavia and other parts of the world.	Noted. This information will be useful to the development of the Draft Plan. The Tourism and Recreation study will also pick up some of this information.
14 Orkney Sea	No comments to add.	Noted.

Question 3. Considering paragraph 6.5, are there other stakeholder engagement and governance related issues that should be investigated through the pilot marine planning process?

Response Number*	Response Summary	Working Group Response
Kayak Association		
15 Kirkwall Kayak Club	No comments to add.	Noted.
16 SportsScotland	Important to recognise that recreational stakeholders will not be limited to those local to the area and that there is national (international) recreational interest in the area and that these interests should be engaged with.	Noted. This information will be useful to the development of the Draft Plan. The Tourism and Recreation study will also pick up some of this information.
17 The Crown Estate	We support the objectives set out in paragraph 6.5 to develop effective means to engage stakeholders in the development of regional marine plans based on lessons learned during the PFOW MSP process. In addition to this, it may also be appropriate to consider lessons learned during other marine spatial planning initiatives such as the National Marine Plan for Scotland and the East of England Inshore and Offshore marine plans currently being developed by the Marine Management Organisation (MMO).	Noted. The lessons learned from other marine spatial planning initiatives will be used. AP36: Lessons learned from other marine spatial planning initiatives will be consulted and taken into consideration.
19 RSPB	No comments.	N/A
20 Highland Council	<p>The Highland Council welcomes being part of the Working Group that is developing the Plan. The Council also welcomes the efforts being made to engage with stakeholders in preparation of the Plan, and encourages continued efforts and the provision of timely feedback to those involved on how the issues raised have been considered in developing the Plan.</p> <p>The CNSRP's Advisory Board might offer a useful additional mechanism to gather views from (and disseminate information to) a range of local organisations (eg Community Councils, Trades Unions, Chamber of Commerce, College etc).</p>	Noted. The CNSRP is included on the stakeholder distribution list and, if necessary, will be contacted directly to facilitate discussion with other stakeholders. AP37: If necessary contact the Caithness & North Sutherland Regeneration Partnership to facilitate discussion with other stakeholders.
21 Scottish Renewables	Scottish Renewables supports using the pilot plan to develop experience for the future regional plans. In particular, we support the desire to learn lessons for streamlining future processes and governance arrangements for Marine Planning Partnerships.	Noted. The lessons learned from the marine spatial planning process will be recorded. AP38: Ensure that lessons learned are recorded to inform future resource needs for regional marine

Question 3. Considering paragraph 6.5, are there other stakeholder engagement and governance related issues that should be investigated through the pilot marine planning process?

Response Number*	Response Summary	Working Group Response
		planning.
22 Scottish Wildlife Trust	No comments.	N/A
23 Scottish Power Renewables	n/a	Noted.
24 Orkney Renewables Energy Forum	No.	Noted.
25 Scottish Salmon Producers Organisation	In terms of governance arrangements for the future Regional Marine Plans it is vital that the private sector is fully involved and represented on any working, advisory and decision making groups and bodies.	Noted. For the pilot Marine Spatial Plan the Advisory Group consists of the Working Group (Marine Scotland, Highland Council and Orkney Islands Council), SNH, SEPA, HS, HIE, RYA, Orkney Harbour and Scrabster Harbour. It is likely that MS-LOT will also join as a member. AP39: Ensure lessons learned from the governance arrangements are recorded to inform future regional marine planning.
26 Orkney Trout Fishing Association	Comments in Question 19 box.	Noted.
27 Colin Kirkpatrick	Comments in Question 19 box.	Noted.
28 Carol	RSPB, "Caithness Biodiversity Group", Whale Dolphin Conservation.	Noted. It is not clear from this response what governance related issues should be investigated.

Question 3. Considering paragraph 6.5, are there other stakeholder engagement and governance related issues that should be investigated through the pilot marine planning process?

Response Number*	Response Summary	Working Group Response
Breckenridge		RSPB and the WDC groups are listed on the stakeholder database and any representation from the Caithness Biodiversity Group is welcome.
29 Highlands and Islands Enterprise	HIE supports the proposal that relevant stakeholders will be taking part. HIE encourages Marine Scotland to contact members of the Pentland Firth and Orkney Waters Leadership Forum, most of the members are included in Annex 3 with the exception of SEGEC.	Noted. The organisations that make up the working group (Marine Scotland, Highland Council and Orkney Islands Council) are all represented on the PFOWLF.
30 Dounreay Site Restoration Ltd.	Comments in Question 19 box.	Noted.
32 Scottish Fishermen's Association	From an SFF point of view it will be essential going forward, to learn the lessons of the need for clarity in full and proper consultation with the catching sector.	Noted. Stakeholder engagement is a vital part of the process of developing the Draft Plan and we will propose to produce a lessons learned document. The Working Group has consulted on an individual and wider basis throughout the process. The consultation events to date i.e. the workshops, evening drop in sessions and the opportunity for one to one meetings were widely advertised and provided many opportunities to discuss the development of the Draft Plan. There will be sector specific focus groups to work through development of policy for the Draft Plan and these are open to all fishermen that wish to participate.

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Question 4. Do you agree with the identified purposes and users of the marine spatial plan set out in Section 6? Are there additional or alternative purposes or users of the plan that should be considered?

Response Number*	Response Summary	Working Group Response
1 Marine Biopolymers	I think the list is inclusive but please make sure under Business and Individual examples you include seaweed harvesting and local added value conversion and also seaweed cultivation	Noted. Section 6.7 acknowledges “there are many individuals, organisations and businesses that will find a pilot marine spatial plan a useful tool...”. However, the list included in paragraph 6.7 is not intended to be a comprehensive list of all business and individuals; it was a short list of likely <i>primary</i> users just to provide examples. AP40: The “Purpose and Use of the Plan” section of the Draft Plan will be drafted to clarify that it is not intended to list all possible businesses.
2 Pentland Firth Yacht Club	Please refer to comments regards Local Amenity Use by local residents above	Noted.
4 Orkney Fisheries Association	Yes.	Noted.
5 Scottish Natural Heritage	<p>Our view is that marine planning should:</p> <ul style="list-style-type: none"> • guide the location of all marine uses and activities and ensure they occur in the most suitable and least sensitive areas; • minimise conflicts of interest and encourage compatible uses; • be guided by clear sustainable development objectives and respect environmental limits to ensure healthy and productive seas in the future; and • identify and safeguard important natural and cultural heritage features and complement the role of Marine Protected Areas. <p>Hence, we broadly support the identified purpose of the Plan as outlined in sections 6.1 to 6.4 and in particular the emphasis on clarity for decision makers and marine users and on maximising beneficial interactions and synergies.</p>	Noted. These suggestions will be taken into consideration when drafting this section of the Draft Plan. AP41: Consider the text describing the suggested purposes of the Draft Plan.

Question 4. Do you agree with the identified purposes and users of the marine spatial plan set out in Section 6? Are there additional or alternative purposes or users of the plan that should be considered?

Response Number*	Response Summary	Working Group Response
	<p>However, we consider that the wording at 1.1 more explicitly captures the importance of safeguarding the environment and of considering the needs and aspirations of local coastal communities, while also enabling commercial development. This more closely aligns with our view of the wider objectives of marine planning.</p> <p>We suggest that The Crown Estate and NGOs be added to the list of potential users and that more focus is given to the strategic role of the Plan, as well as to its use with respect to decision making for individual projects.</p>	<p>Noted. Section 6.7 acknowledges “there are many individuals, organisations and businesses that will find a pilot marine spatial plan a useful tool...”. However, the list included in paragraph 6.7 is not intended to be a comprehensive list of all business and individuals; it was a short list of likely <i>primary</i> users just to provide examples.</p> <p>AP42: The “Purpose and Use of the Plan” section of the Draft Plan will be drafted to clarify that it is not intended to list all possible businesses.</p>
6 Scottish Environment Protection Agency	We agree with the identified purposes and uses of the marine spatial plan as set out in section 6.	Noted.
7 Pentland Canoe Club	No comments.	N/A
8 Scottish Water	<p>Existing and likely future Scottish Water assets, such as sea outfalls, will be located within the geographical scope of the emerging marine spatial plan.</p> <p>The plan must recognise this essential function, make provision of appropriate development of this nature and safeguard against potential uses which could conflict with infrastructure needs.</p>	<p>Noted. This will be addressed in Policy 5A Water Environment in the Draft Plan and Scottish Water will be contacted for further information to ensure this information is captured in the Draft Plan.</p> <p>AP43: Ensure that Scottish Water assets are included in the development of the Draft Plan where data are</p>

Question 4. Do you agree with the identified purposes and users of the marine spatial plan set out in Section 6? Are there additional or alternative purposes or users of the plan that should be considered?

Response Number*	Response Summary	Working Group Response
		available.
9 Caithness Kayak Club	Seems a complete list, but getting the correct balance of use will be important.	Noted.
10 Individual	<p>In Section 6 of the Consultation Paper major commercial aspects of the Pilot Plan such as ports, ferry terminals, oil terminals, ship to ship transfers are not included yet the “Plan Scheme” states in Section 1, Introduction, Background the following:-</p> <p>“The pilot plan will promote the sustainable management and development of the marine environment and will incorporate economic, environmental and social considerations into marine development decision making.”</p> <p>“The pilot plan aims to develop a strategic decision making framework for licensing and other consent applications in the marine area. The plan will seek to reconcile the aspirations of all users of the marine area including the interests of the marine renewable energy sector, inshore fisheries, shipping and navigation, aquaculture, the oil and gas sector, recreation (by locals and visitors) and tourism. The plan will promote sustainable economic growth and management of the marine environment.”</p> <p>The Plan Framework Section 1, Introduction Para 3 states the following</p> <p>“In preparing an MSP all users of the sea and all aspects of environment must be considered. This Framework document therefore considers all sectors, and integrates the results of the RLG to provide more detailed consideration of the specific issues associated with marine energy projects.”</p> <p>INTRODUCTION (Plan Scheme) Page 4</p> <p>“Marine (Scotland) Act 2010 (“the Act”) provides Scottish Ministers with the powers to introduce statutory marine planning for Scotland’s seas. The Act</p>	<p>Noted. The relevant section of the Draft Plan will be modified to improve clarity and be more comprehensive. A balance has had to be struck between brevity and the inclusion of all relevant information so as the development of the Draft Plan has evolved there have been changes to the text. However, it is clear from these comments that there is a need to clarify certain aspects of the text and to make clear what is included in the Draft Plan.</p> <p>AP44: Ensure the links between the documents are clear and ensure that it is clear that all users are considered although in the interests of keeping the documents concise they may not all be listed.</p>

Question 4. Do you agree with the identified purposes and users of the marine spatial plan set out in Section 6? Are there additional or alternative purposes or users of the plan that should be considered?

Response Number*	Response Summary	Working Group Response
	<p>creates a new legislative and management framework for the marine environment to manage the competing demands of the use of the sea whilst ensuring protection of the marine environment.</p> <p>The Act sets out a simplified marine licensing process that will cover nearly all anticipated activities in the marine environment with the exception of aquaculture within 3 nautical miles, which is consented by local authorities. Public authorities have to take authorisation decisions in accordance with marine plans, as defined in the Act, unless relevant considerations indicate otherwise.”</p> <p>By now I am completely confused on what is IN and what is OUT?</p> <p>Does this mean that Local Authorities are outside the plan where their consent is needed or is OIC to be considered as a “user”? How does the Plan go about reflecting the policies of the Local Authorities? Surely ports, terminals etc are economic.</p> <p>In 6.7 of the Consultation Document you state</p> <p>“Orkney Islands Council (Orkney Harbour Authority) will use the plan to inform decisions on Works Licence applications”</p> <p>As the Pilot Plan is non-statutory is the word “will” imperative? I am taking this in relationship to OIC being the licensing authority for aquaculture. Since OIC became the consenting authority for aquaculture there have been no consultation documents sent to RYA Scotland although I believe there have been applications.</p> <p>6.4 of the Consultation Document states</p> <p>The main purposes of the pilot plan are:</p>	<p>Noted. The relevant section of the Draft Plan will be modified to ensure the status of Local Authorities in relation to the Draft Plan is clear.</p> <p>AP45: Ensure there is clarity regarding the status of the Local Authorities.</p> <p>Noted. The language used will reflect the non-statutory nature of the Draft Plan.</p> <p>AP46: Ensure that the language used reflects the non-statutory nature of the Draft Plan.</p>

Question 4. Do you agree with the identified purposes and users of the marine spatial plan set out in Section 6? Are there additional or alternative purposes or users of the plan that should be considered?

Response Number*	Response Summary	Working Group Response
	<ul style="list-style-type: none"> • To establish a coherent strategic vision and objectives to achieve sustainable development; • To set out policies to support the delivery of sustainable development; • To produce and use relevant, reliable and robust information to support the plan policies, inform decision making and support the sustainable management of the marine environment; and • To develop a framework for integrating marine planning with terrestrial Planning <p>Combining the discussion document with the Framework and the Scheme Plan there does seem to be a lack of coherence.</p>	<p>Noted. The development of the Draft Plan has evolved as these documents have been produced and it has been necessary to refine and condense some text in the interests of clarity. However, as this seems to have caused some confusion some text will be added to the Draft Plan to explain the differences between the documents.</p> <p>AP47: Ensure the text is clear that the development of the Draft Plan has led to some changes in the language used and ensure that this is kept to a minimum.</p>
12 Orkney Sustainable Fisheries Ltd.	Yes	Noted.
13 Royal Yachting Association	The list of users should include The Crown Estate. Also, consultants employed by developers should perhaps be mentioned explicitly. Bullet point 4 could emphasise that the plan could help the integration of the terrestrial and marine planning regimes. RYA suggests that the second last bullet point should be amended to read 'A variety of existing marine users and their representatives....'.	<p>Noted. Section 6.7 acknowledges “there are many individuals, organisations and businesses that will find a pilot marine spatial plan a useful tool...”. However, the list included in paragraph 6.7 is not intended to be a comprehensive list of all business and individuals; it was a short list of likely <i>primary</i> users just to provide examples.</p> <p>AP48: The “Purpose and Use of the Plan” section of the Draft Plan will be drafted to clarify that it is not intended to list all possible businesses.</p>
14 Orkney Sea Kayak Association	<p>Recreation should be identified as a stand-alone sector in the marine environment.</p> <p>Links between Recreation and Tourism are acknowledged, however we believe the needs of the two user groups are substantially different and therefore should</p>	<p>Noted. This will be addressed in the Draft Plan. Consideration will be given to having two policies, one each for Tourism and Recreation. Further information will be provided by the Tourism and Recreation study.</p>

Question 4. Do you agree with the identified purposes and users of the marine spatial plan set out in Section 6? Are there additional or alternative purposes or users of the plan that should be considered?

Response Number*	Response Summary	Working Group Response
	<p>be considered in the plan as independent sectors. We also highlight that there exist several user groups within Recreation, many of whom share the same needs but several of whom have substantially differing needs, e.g. paddlesport and sailing.</p> <p>We agree with the identified purposes of the MSP.</p>	<p>AP49: Develop separate tourism and recreation policy sections.</p>
15 Kirkwall Kayak Club	<p>We propose that Recreation should be identified as a stand-alone user of the marine environment.</p> <p>We acknowledge the links between Recreation and Tourism but we believe the needs of the two user groups are substantially different and therefore should be considered in the plan as independent sectors. We also highlight that there exist several user groups within Recreation, many of whom share the same needs but several of whom have substantially differing needs, e.g. paddlesport and sailing.</p> <p>We agree with the identified purposes of the MSP.</p>	<p>Noted. This will be addressed in the Draft Plan. Consideration will be given to having two policies, one each for Tourism and Recreation. Further information will be provided by the Tourism and Recreation study.</p> <p>AP50: Develop separate tourism and recreation policy sections.</p> <p>Noted.</p>
16 SportsScotland	No comments.	N/A
17 The Crown Estate	<p>The main purposes identified for the plan are:</p> <ul style="list-style-type: none"> • To establish a coherent strategic vision and objectives to achieve sustainable development; • To set out policies to support the delivery of sustainable development; • To produce and use relevant, reliable and robust information to support the plan policies, inform decision making and support the sustainable management of the marine environment; and • To develop a framework for integrating marine planning with terrestrial planning. <p>In addition to these points, we would also suggest the purpose of the plan includes the following points:</p> <ul style="list-style-type: none"> • To provide a coherent plan to inform and guide the regulation, management 	<p>Noted. The suggested changes to the text will be considered in the development of the Draft Plan.</p> <p>AP51: Consider the suggested changes to the text in the development of the Draft Plan.</p>

Question 4. Do you agree with the identified purposes and users of the marine spatial plan set out in Section 6? Are there additional or alternative purposes or users of the plan that should be considered?

Response Number*	Response Summary	Working Group Response
	<p>and use of the environs to which the plan applies;</p> <ul style="list-style-type: none"> To provide clarity and direction to users of the marine environment as to how it will be managed and regulated and the framework within which decisions will be taken. <p>We agree that developing a vision is an important part of the planning process and working with stakeholders to develop this vision and the objectives required to meet it, is an effective way of engaging stakeholders. A clear vision for the plan area will help to describe the overall intended direction of travel for the duration of the plan period and will set out the type of development expected to be brought forward and the characteristics of the plan area which are sought to be maintained or enhanced.</p> <p>In terms of users of the plan, we would also like The Crown Estate included in the list of users as a business who wish to deliver sustainable development, but also as a public authority under the Marine (Scotland) Act (2009).</p>	<p>Noted. Stakeholder engagement is a vital part of the process of developing the Draft Plan.</p> <p>AP52: Ensure that opportunities for stakeholder engagement are provided at all stages of the development of the Draft Plan. Update the Plan Scheme timetable outlining when consultation will take place and ensure this information is made available to stakeholders.</p> <p>Noted. Section 6.7 acknowledges “there are many individuals, organisations and businesses that will find a pilot marine spatial plan a useful tool...”. However, the list included in paragraph 6.7 is not intended to be a comprehensive list of all business and individuals; it was a short list of likely <i>primary</i> users just to provide examples.</p> <p>AP53: The “Purpose and Use of the Plan” section of the Draft Plan will be drafted to clarify that it is not intended to list all possible businesses.</p>
19 RSPB	<p>Section 6.4</p> <p>In relation to that set out in the third bullet point, another purpose of the Plan is to contribute to and support achievement of the Marine Strategy Framework Directive’s goal of good environmental status across Europe’s marine environment by 2020 through working towards the 11 descriptors that constitute GES.</p>	<p>Noted. The Draft Plan will be developed within the context of relevant legislation including the Marine Strategy Framework Directive. The relevant section of the Draft Plan will be drafted to ensure clarity on this issue.</p>

Question 4. Do you agree with the identified purposes and users of the marine spatial plan set out in Section 6? Are there additional or alternative purposes or users of the plan that should be considered?

Response Number*	Response Summary	Working Group Response
	<p>Section 6.7 We recommend that the natural environment is considered not only as the physical system in which users of the marine area are active, but also in the context of those who work to and have aspirations for the protection, enhancement and sustainable management of the area’s natural resource.</p> <p>In this context, there are a number of bodies, including environmental NGOs, who should be included as ‘users’ of the marine area and marine spatial plan (MSP).</p>	<p>AP54: Clear reference to the Marine Strategy Framework Directive and how the Draft Plan will contribute to Good Environmental Status will be included.</p> <p>Noted. These issues will be dealt with by the guiding principles and related natural heritage policies and will also be taken into account in the Environmental Report.</p> <p>Noted. Section 6.7 acknowledges “there are many individuals, organisations and businesses that will find a pilot marine spatial plan a useful tool...”. However, the list included in paragraph 6.7 is not intended to be a comprehensive list of all business and individuals; it was a short list of likely <i>primary</i> users just to provide examples.</p> <p>AP55: The “Purpose and Use of the Plan” section of the Draft Plan will be drafted to clarify that it is not intended to list all possible businesses.</p>
20 Highland Council	<p>In terms of the identified purposes of the Plan, we welcome that one of the main purposes is to establish a coherent strategic vision, and objectives to achieve sustainable development. Enabling and accommodating sustainable economic growth and regeneration is of vital importance, particularly in the context of achieving the vision of the Caithness and North Sutherland Regeneration Partnership.</p> <p>In terms of the identified users of the Plan, it is appreciated that the list is not intended to be exclusive or exhaustive. However, under the category of businesses and individuals that wish to deliver new development in the marine area there should be specific mention of the oil and gas sector and electricity grid provider, given the significant development interest that is expected in the</p>	<p>Noted.</p> <p>Noted. Section 6.7 acknowledges “there are many individuals, organisations and businesses that will find a pilot marine spatial plan a useful tool...”. However, the list included in paragraph 6.7 is not intended to be a</p>

Question 4. Do you agree with the identified purposes and users of the marine spatial plan set out in Section 6? Are there additional or alternative purposes or users of the plan that should be considered?

Response Number*	Response Summary	Working Group Response
	<p>Plan area. There should also be specific reference to Port Authorities/ Harbour Trusts/ Highland Council Harbours (eg Scrabster, Gills, John O’Groats). Also, under the category of existing marine users there should be specific mention of defence (Ministry of Defence). The inclusion of terrestrial planning activity of the two Councils is welcomed, but should not be limited to use in the consideration of planning applications: it should also include use informing spatial strategies in terrestrial planning (e.g. in Local Development Plans) and in informing pre-application advice. There could also usefully be reference to the Department of Energy and Climate Change (DECC), who should have regard to the marine spatial plan in so far as it could be relevant to matters regulated by DECC rather than Marine Scotland e.g. decommissioning.</p>	<p>comprehensive list of all business and individuals; it was a short list of likely <i>primary</i> users just to provide examples.</p> <p>AP56: The “Purpose and Use of the Plan” section of the Draft Plan will be drafted to clarify that it is not intended to list all possible businesses. Noted.</p> <p>AP57: The integration of terrestrial and marine planning regimes is an important aspect of the Draft Plan and is dealt with under Policy 2A.</p>
<p>21 Scottish Renewables</p>	<p>Scottish Renewables supports the purposes of the plan as set out in section 6.</p> <p>In addition, the plan must also help to deliver the policies outlined in the National Marine Plan, the Marine Policy Statement and the sectoral marine plans. A direct reference to the plan’s need to help address climate change should also be included.</p> <p>Scottish Ministers should be added to the list of users as they are the ultimate decision makers in relation to awarding of marine and s36 licences.</p>	<p>Noted.</p> <p>Noted.</p> <p>AP58: Ensure the relationship between the Draft Plan and other plans and policies is clear. Climate change will be a policy area within the Draft Plan.</p> <p>Noted. Section 6.7 acknowledges “there are many individuals, organisations and businesses that will find a pilot marine spatial plan a useful tool...”. However, the list included in paragraph 6.7 is not intended to be a comprehensive list of all business and individuals; it was a short list of likely <i>primary</i> users just to provide examples. MS-LOT, on behalf of Scottish Ministers, process the marine licences and are at the top of the list.</p> <p>AP59: The “Purpose and Use of the Plan” section of the Draft Plan will be drafted to clarify that it is not intended</p>

Question 4. Do you agree with the identified purposes and users of the marine spatial plan set out in Section 6? Are there additional or alternative purposes or users of the plan that should be considered?

Response Number*	Response Summary	Working Group Response
22 Scottish Wildlife Trust	<p>6.4 - a purpose to achieve sustainable development, <u>including the protection and, where appropriate, enhancement of the health</u> of plan area would be consistent with duties under the Marine (Scotland) Act. Additionally, the inclusion of a purpose to achieve and maintain Good Environmental Status under the MSFD. Both would aid transition to statutory regional planning.</p> <p>6.7 – those concerned in the conservation and management of natural systems could also be described as users of the pilot plan – this could include research institutions and NGOs. SNH could use the plan in the management of MPAs and coastal protected sites as well as to inform consultation responses.</p>	<p>to list all possible businesses.</p> <p>Noted. The Draft Plan will be developed within the context of relevant legislation including the Marine Strategy Framework Directive. The relevant section of the Draft Plan will be modified to improve clarity on this issue.</p> <p>AP60: Consider the suggested changes to the text in the development of the Draft Plan.</p> <p>Noted. Section 6.7 acknowledges “there are many individuals, organisations and businesses that will find a pilot marine spatial plan a useful tool...”. However, the list included in paragraph 6.7 is not intended to be a comprehensive list of all business and individuals; it was a short list of likely <i>primary</i> users just to provide examples.</p> <p>AP61: The “Purpose and Use of the Plan” section of the Draft Plan will be drafted to clarify that it is not intended to list all possible businesses.</p>
23 Scottish Power Renewables	No comments.	N/A
24 Orkney Renewables Energy Forum	Specific mention should perhaps be made to marine energy support contractors - the knowledge base that these companies can offer is extensive, only some of their activities are covered in the proposed wording. Furthermore business and industry forums would use and advise on the spatial plan.	Noted. Section 6.7 acknowledges “there are many individuals, organisations and businesses that will find a pilot marine spatial plan a useful tool...”. However, the list included in paragraph 6.7 is not intended to be a comprehensive list of all business and individuals; it was a short list of likely <i>primary</i> users just to provide examples.

Question 4. Do you agree with the identified purposes and users of the marine spatial plan set out in Section 6? Are there additional or alternative purposes or users of the plan that should be considered?

Response Number*	Response Summary	Working Group Response
		AP62: The “Purpose and Use of the Plan” section of the Draft Plan will be drafted to clarify that it is not intended to list all possible businesses.
25 Scottish Salmon Producers Organisation	Given that one of the primary objectives of marine planning is to encourage and enable sustainable economic growth’ it is essential that those who wish to invest and develop in the marine area are recognised as prime users of the plan. Without them there would be no decisions for the regulators to make. The plan should therefore be designed and written primarily with investors/developers in mind and in a way that increases certainty and confidence. Wherever possible the plan should seek to presume in favour of development and minimise constraints. The choice of language is key to this.	Noted. The Draft Plan aims to balance the needs of the economic sector and wider activities whilst protecting the natural environment on which they depend. The Draft Plan will set out policies that present the planning considerations that will be taken into account in the assessment of consent applications by public authorities.
26 Orkney Trout Fishing Association	Comments in Question 19 box.	Noted.
27 Colin Kirkpatrick	Comments in Question 19 box.	Noted.
28 Carol Breckenridge	RSPB, “Caithness Biodiversity “, Whale and Dolphin Conservation.	Noted. It is not clear from this response what changes are required to the identified purposes and users of the Draft Plan. RSPB and the WDC groups are listed on the stakeholder database and any representation from the Caithness Biodiversity Group is welcome.
29 Highlands and Islands Enterprise	HIE recognise the importance Marine Scotland have placed on supporting sustainable development of key sectors and the balance aspirations for increased use of marine resources with the sustainable management of the marine and coastal environment, ecosystems and natural resources.	Noted.
30 Dounreay Site Restoration Ltd.	Comments in Question 19 box.	Noted.

Question 4. Do you agree with the identified purposes and users of the marine spatial plan set out in Section 6? Are there additional or alternative purposes or users of the plan that should be considered?

Response Number*	Response Summary	Working Group Response
32 Scottish Fishermen's Association	The SFF would expect that the plan should note the 2 basic freedoms which The Crown Estate should uphold: The right to navigation and the right to fish. Following on from that the MSP should not without good reason deny fishermen access to the grounds they make a living from.	Noted. Navigation rights are dealt with by the Maritime and Coastguard Agency and will be considered in the Shipping, Navigation and Marine Safety sections. A right (or entitlement) to fish has been developed through common law (or case law) but is not an absolute right and can be subject to statutory restriction. Any development that is likely to have an impact on fishing would require the developer to liaise with fishermen using that area and take their concerns into account. Objections raised would be noted in the recommendations to Ministers to inform their determination decision. Fishermen would have the opportunity to raise issues during the consultation process for developments and, if necessary, a liaison group would be set up to help resolve issues between the developers and fishermen. For the renewables industry there is guidance in place to assist this process: the Fishing Liaison with Offshore and Wet Renewables (FLOWW) Best Practice Guidelines.

*Responses number 3 and 31 were in relation to the draft Environmental Report and are not included here. Response number 11 cannot be made public as a Respondent Information Form was not received and number 18 was from an individual that did not give permission to make their response public.

Question 5. Should the existing Pilot Pentland Firth and Orkney Waters Marine Spatial Plan boundary be realigned with the boundaries of the proposed Scottish Marine Regions or do you think the existing “strategic area” boundary is appropriate? (Refer to Figures 5 and 6).

Response Number*	Response Summary	Working Group Response
1 Marine Biopolymers	The Figure 6 proposal looks to be perfectly good – the main thing is that there should ultimately be consistency of approach, as well as good agreement between parties, across the entire Scottish waters area covered by Scottish Marine Regions	Noted. Agree with SMR. AP63: The majority of the responses supported aligning the boundaries with the proposed Scottish Marine Regions and the Draft Plan will be developed on this basis.
2 Pentland Firth Yacht Club	As long as the same area is included e.g. Skule Skerry then a single strategic area might be more appropriate to ensure an integrated response and less bureaucracy. The geography, flora, fauna and culture of this area is similar and interdependent throughout. We don't have strong feelings and think it would be wasteful to debate too much on this	Noted. Agree with SMR. AP64: The majority of the responses supported aligning the boundaries with the proposed Scottish Marine Regions and the Draft Plan will be developed on this basis.
4 Orkney Fisheries Association	From an Orkney Fisheries perspective either of the boundary options would be suitable as most of our fleet operates within inshore areas however for logical and effective management and operation of the Orkney Fishery a discrete Orkney boundary would work best which did not include parts of the Scottish Mainland. We understand that other sectors might wish to adopt the strategic area option to minimise bureaucracy should their activity cross more than one SMR. The strategic area will potentially incorporate the boundaries of two IFGs, The North West IFG and the Moray Firth IFG as well as the proposed Orkney Management Model. Although the Orkney management model is still embryonic, the plan should none the less make clear the relationship between the IFGs and the marine planning body and highlight the opportunities for area fisheries management plans to complement the marine spatial plan. A map highlighting the boundaries of the IFGs should be incorporated into the marine spatial plan when these have been confirmed.	Noted. Neutral. AP65: The majority of the responses supported aligning the boundaries with the proposed Scottish Marine Regions and the Draft Plan will be developed on this basis.
5 Scottish Natural Heritage	As per our response of 28 th February to the Consultation on The Draft Scottish Marine Regions Order 2013, we would favour realignment of the boundaries of the pilot PFOW Plan to accommodate the whole of the North Coast and Orkney Waters proposed SMRs (i.e. Figure 6). We would also strongly support amalgamation of these two proposed SMRs into a single marine planning region.	Noted. Agree with SMR. AP66: The majority of the responses supported aligning the boundaries with the proposed Scottish Marine Regions and the Draft Plan will be developed on this basis.

Question 5. Should the existing Pilot Pentland Firth and Orkney Waters Marine Spatial Plan boundary be realigned with the boundaries of the proposed Scottish Marine Regions or do you think the existing “strategic area” boundary is appropriate? (Refer to Figures 5 and 6).

Response Number*	Response Summary	Working Group Response
6 Scottish Environment Protection Agency	We suggest that it would be better if the existing Pilot Pentland Firth and Orkney Waters Marine Spatial Plan boundary was realigned with the boundaries of the proposed Scottish Marine Region. This will help reduce the number of different boundaries that marine planners and managers will need to consider. It may also be helpful when it comes to collecting data and monitoring to have the same boundary.	Noted. Agree with SMR. AP67: The majority of the responses supported aligning the boundaries with the proposed Scottish Marine Regions and the Draft Plan will be developed on this basis.
7 Pentland Canoe Club	There maybe benefit to realign the existing PFOW Marine Spatial Plan to the boundaries of the proposed Scottish Marine Regions. However if this was done, there would need to be a close working basis for the Pentland Firth Area (the area of water between Dunnet Head and Duncansby Head) to ensure that same plans / polices/etc were being adopted.	Noted. Agree with SMR. AP68: The majority of the responses supported aligning the boundaries with the proposed Scottish Marine Regions and the Draft Plan will be developed on this basis.
8 Scottish Water	We understand that the pilot plan will be non-statutory but will inform the production of future statutory plans and would favour re-alignment of the pilot plan boundaries with the proposed Scottish Marine Region (SMR) boundaries	Noted. Agree with SMR. AP69: The majority of the responses supported aligning the boundaries with the proposed Scottish Marine Regions and the Draft Plan will be developed on this basis.
9 Caithness Kayak Club	Prefer the holistic approach, as more likely that local authorities will work together.	Noted. Agree with SMR. AP70: The majority of the responses supported aligning the boundaries with the proposed Scottish Marine Regions and the Draft Plan will be developed on this basis.
10 Individual	There was some agreement that the area should be based upon the proposed Scottish Marine Regions. However Orkney Harbours did have some reservations as regards the handling of traffic in the east of the area where currently tanker de-ballasting takes place. Should renewables take place in the Outer Sound then there could be some conflicts of interest across the border line as regards the control of shipping. Section 6 does not cover this border line. This would need to be looked into.As regards renewables in the Outer Sound these would probably all be connected through Caithness due to the	Noted. Neutral. AP71: The majority of the responses supported aligning the boundaries with the proposed Scottish Marine Regions and the Draft Plan will be developed on this basis.

Question 5. Should the existing Pilot Pentland Firth and Orkney Waters Marine Spatial Plan boundary be realigned with the boundaries of the proposed Scottish Marine Regions or do you think the existing “strategic area” boundary is appropriate? (Refer to Figures 5 and 6).

Response Number*	Response Summary	Working Group Response
	cable capacity between Orkney and the mainland of Scotland. The latest study of renewables in the Pentland Firth has downgraded the available Gigawatts from 9+ to between 1 and 2. This will make it more likely that the Outer Sound will need to be used resulting in navigation problems due to the amount of deeply laden ships. If ships are forced to take passage to the north of Orkney their fuel consumption would be increased. This would defeat the purpose of having marine renewables in this area.	
12 Orkney Sustainable Fisheries Ltd.	From an Orkney Fisheries perspective either of the boundary options would be suitable as most of our fleet operates within inshore areas however for logical and effective management and operation of the Orkney Fishery a discrete Orkney boundary would work best which did not include parts of the Scottish Mainland. A map highlighting the boundaries of the IFGs should be incorporated into the marine spatial plan when these have been confirmed.	Noted. Neutral. AP72: The majority of the responses supported aligning the boundaries with the proposed Scottish Marine Regions and the Draft Plan will be developed on this basis.
13 Royal Yachting Association	Realignment with the Marine Region boundaries would help to avoid duplication of effort. Most activity will be within the existing boundaries and the extension could be done with little additional effort.	Noted. Agree with SMR. AP73: The majority of the responses supported aligning the boundaries with the proposed Scottish Marine Regions and the Draft Plan will be developed on this basis.
14 Orkney Sea Kayak Association	Yes the PFOW MSP boundary should be realigned with the boundaries of the proposed Scottish Marine Regions.	Noted. Agree with SMR. AP74: The majority of the responses supported aligning the boundaries with the proposed Scottish Marine Regions and the Draft Plan will be developed on this basis.
15 Kirkwall Kayak Club	We believe the proposed area based on the Scottish Marine Regions offers the best boundary for the PFOW MSP because it includes a larger area of sea adjacent to the North Coast and also includes Sule Skerry, which we hope would enable more holistic decision-making on issues which have the potential to affect large areas of sea. We note that Figure 6 p.26 divides the area into North Coast and Orkney, which may detract from the proposed area being considered as one unit.	Noted. Agree with SMR. AP75: The majority of the responses supported aligning the boundaries with the proposed Scottish Marine Regions and the Draft Plan will be developed on this basis.

Question 5. Should the existing Pilot Pentland Firth and Orkney Waters Marine Spatial Plan boundary be realigned with the boundaries of the proposed Scottish Marine Regions or do you think the existing “strategic area” boundary is appropriate? (Refer to Figures 5 and 6).

Response Number*	Response Summary	Working Group Response
16 SportsScotland	No comments.	Noted.
17 The Crown Estate	We support the proposal that the plan follows the boundaries of the Scottish Marine Regions as proposed in Figure 6. In our response to the Scottish Marine Regions Boundaries consultation in February 2013, we raised concerns regarding the practicality of the Regional Boundaries proposed around the Pentland Firth and Orkney Waters area. The plan area overlaps with two of the proposed Marine Regions – the North Coast and Orkney Marine Regions. Further clarity on how these administrative regions will work together on planning matters is required in order to ensure that the plan and any future plans for the North Coast and Orkney Marine Regions are consistent and deliver the objectives set for each plan. In addition, we have some concerns about the feasibility of managing the area to the west of John O’Groats where there are three Marine Regions in a relatively small area. We would suggest that the North Coast Marine Region need not extend out to the 12nm limit.	Noted. Agree with SMR. AP76: The majority of the responses supported aligning the boundaries with the proposed Scottish Marine Regions and the Draft Plan will be developed on this basis.
19 RSPB	The existing ‘strategic area’ is appropriate in terms of retaining continuity between the plan and the ecological unit that is the Pentland Firth & Orkney Waters. However, establishment of the marine regions will result in the separation of this ecological unit across two authority areas. As a result it is necessary to ensure there is a mechanism in place that effectively integrates the two authorities and their spatial plans so that they may contribute effectively, together, to the sustainable development of the whole region/ ecological unit. The alternative would be to alter the forthcoming Scottish Marine Regions to be contiguous with the strategic area boundary.	Noted. Would prefer an alternative. AP77: The majority of the responses supported aligning the boundaries with the proposed Scottish Marine Regions and the Draft Plan will be developed on this basis.
20 Highland Council	Yes, the boundary should reflect the boundaries for the proposed Scottish Marine Regions. It makes sense to align to this boundary now and achieve a marine spatial plan, albeit a pilot, which uses the proposed Scottish Marine Regions as ‘building blocks’ to create the area covered. This should simplify and streamline matters later on in the marine spatial planning process.	Noted. Agree with SMR. AP78: The majority of the responses supported aligning the boundaries with the proposed Scottish Marine Regions and the Draft Plan will be developed on this basis.
21	Given the potential for the PFOW area to be subject to seven separate plans	Noted. Would prefer an alternative.

Question 5. Should the existing Pilot Pentland Firth and Orkney Waters Marine Spatial Plan boundary be realigned with the boundaries of the proposed Scottish Marine Regions or do you think the existing “strategic area” boundary is appropriate? (Refer to Figures 5 and 6).

Response Number*	Response Summary	Working Group Response
Scottish Renewables	<p>(National Marine Plan, Sectoral Wave Energy Plan, Sectoral Tidal Energy Plan, Sectoral Offshore Wind Energy Plan, ‘North Coast’ Plan, ‘Orkney’ Plan and pilot PFOW Plan), we believe the boundaries of the proposed marine regions should be amended to match the pilot plan area. This would enable the pilot plan to be adopted as the statutory regional plan for the PFOW area, subject to the requirements of the Marine (Scotland) Act. Creating a single PFOW region would mean the area is eventually subject to just five plans (National Marine Plan, the three sectoral plans and Regional Plan), rather than the currently proposed seven. This would also mean only one Marine Planning Partnership (MPP) would need to be created to manage the regional planning of the PFOW area. We accept this would involve a slight extension to the west of the current pilot PFOW plan but believe this would involve fewer resources than the creation of two new plans and two separate MPPs. We understand that if the pilot plan is approved by the Scottish Ministers it will become a material consideration in the determination of marine licensing applications and consideration will also be given to the pilot by the Scottish Ministers when they make relevant decisions even if it is not subsequently approved by them. There is also potential for Highland Council and Orkney Islands Council to adopt the pilot plan as Supplementary Planning Guidance or as Supplementary Guidance to the appropriate Local Development Plan. Given the pilot plan will most likely constitute a material consideration, we request further clarity on whether it will actually be adopted as supplementary guidance by the Councils or if there is any mechanism open to the Scottish Government to direct the Councils to do so. We also believe the relationships between the pilot PFOW spatial plan, the regional plan, the National Marine Plan and the sectoral plan (currently being developed by Marine Scotland) is still unclear. Clarification that if there are discrepancies between the plans, the sectoral plans and the statutory regional plans (when developed) will take precedence over the non statutory pilot plan is required.</p>	<p>AP79: The majority of the responses supported aligning the boundaries with the proposed Scottish Marine Regions and the Draft Plan will be developed on this basis.</p>
22 Scottish Wildlife Trust	<p>It makes sense for the pilot plan to match the boundaries of the proposed North Coast and Orkney marine regions as illustrated in Figure 6. There are clear efficiencies to this change when considering the transition to statutory regional</p>	<p>Noted. Agree with SMR.</p> <p>AP80: The majority of the responses supported aligning</p>

Question 5. Should the existing Pilot Pentland Firth and Orkney Waters Marine Spatial Plan boundary be realigned with the boundaries of the proposed Scottish Marine Regions or do you think the existing “strategic area” boundary is appropriate? (Refer to Figures 5 and 6).

Response Number*	Response Summary	Working Group Response
	<p>planning – not least in streamlining the process to reduce burden on stakeholders. We are concerned that while the pilot area encompasses the whole of the Pentland Firth, the proposal for regional planning will split the firth between two authorities. We remain opposed to the subdividing of units of ecological continuity (e.g. firths, sea lochs or sounds) in setting the boundaries of regional marine planning. However, we are confident that a strong partnership between Orkney and Highland authorities during the pilot phase can help foster a common approach to managing the pentland firth as a single unit through marine planning partnerships. We would encourage that a key part of learning from the pilot process focuses on future working arrangements to ensure collaboration and agreement across administrative boundaries.</p>	<p>the boundaries with the proposed Scottish Marine Regions and the Draft Plan will be developed on this basis.</p>
<p>23 Scottish Power Renewables</p>	<p>Page 24, Paragraph 6.10</p> <p>How are this Draft Plan and the statutory Regional Marine Plan for the area to be treated, especially if there is any overlap and/or contradictory advice within the guidance between the two plans? This will be of particular concern if both plans are of material consideration (as stated for this plan in Paragraph 6.9).</p> <p>Page 24, Paragraph 6.11</p> <p>For the area of the Pentland Firth there is the potential to have this plan and 3 other RMPs covering the area, all potentially of material consideration and all potentially differing in their guidance. Is there a requirement for this Draft Plan, or should the focus be on the RMPs themselves in order to minimise potential conflict?</p> <p>Page 24, Paragraph 6.13</p> <p>Given that The Crown Estate PFOW SA was arbitrarily drawn in the first instance there is a need to clarify the boundary here and not simply state that it was chosen because it already existed. The area of the Draft Plan should be fit for purpose and this should be defensible.</p>	<p>Noted. Agree with SMR.</p> <p>AP81: The majority of the responses supported aligning the boundaries with the proposed Scottish Marine Regions and the Draft Plan will be developed on this basis.</p>

Question 5. Should the existing Pilot Pentland Firth and Orkney Waters Marine Spatial Plan boundary be realigned with the boundaries of the proposed Scottish Marine Regions or do you think the existing “strategic area” boundary is appropriate? (Refer to Figures 5 and 6).

Response Number*	Response Summary	Working Group Response
	<p>Question 5, Page 26</p> <p>The Spatial Plan boundary cannot be considered to be appropriate as it was not selected from first principals, but is a boundary that was defined for a different purpose (and this boundary has since altered also). Therefore, it would make more sense to re-align the plan boundary to fit with the North Coast and Orkney SMRs. This should have the benefit of preventing confusion in the future when these two SMRs draw up their own RMPs.</p>	
24 Orkney Renewables Energy Forum	<p>Whichever route is chosen, it is vital that the overlap in marine planning and land based planning jurisdictions concerning the intertidal area between mean low water springs and mean high water springs is fully clarified. If neither regulatory system is able to renege control of this specific area, the consenting process could be significantly delayed though this over-complication. What if both consenting bodies cannot agree on development proposals in this specific area?</p>	<p>Noted. Neutral.</p> <p>AP82: The majority of the responses supported aligning the boundaries with the proposed Scottish Marine Regions and the Draft Plan will be developed on this basis.</p> <p>AP83: We will address this in Policy 2A Integrating Marine and Coastal Development.</p>
25 Scottish Salmon Producers Organisation	<p>Yes</p>	<p>Noted. Agree with SMR (based on discussions at workshop as well)</p> <p>AP84: The majority of the responses supported aligning the boundaries with the proposed Scottish Marine Regions and the Draft Plan will be developed on this basis.</p>
26 Orkney Trout Fishing Association	<p>Comments in Question 19 box.</p>	<p>Noted.</p>
27 Colin Kirkpatrick	<p>Comments in Question 19 box.</p>	<p>Noted.</p>

Question 5. Should the existing Pilot Pentland Firth and Orkney Waters Marine Spatial Plan boundary be realigned with the boundaries of the proposed Scottish Marine Regions or do you think the existing “strategic area” boundary is appropriate? (Refer to Figures 5 and 6).

Response Number*	Response Summary	Working Group Response
28 Carol Breckenridge	Inappropriate	Noted.
29 Highlands and Islands Enterprise	HIE strongly support Marine Scotland to extend the existing boundaries to include West Highlands, Moray and Shetland enabling and supporting sustainable economic growth across the Highlands and Islands.	Noted. Alternative suggested. AP85: The majority of the responses supported aligning the boundaries with the proposed Scottish Marine Regions and the Draft Plan will be developed on this basis.
30 Dounreay Site Restoration Ltd.	Comments in Question 19 box.	Noted.
32 Scottish Fishermen’s Association	The SFF belief that if following the earlier consultation, new boundaries are recommended, the plan should be realigned to match them.	Noted. Agree with SMR. AP86: The majority of the responses supported aligning the boundaries with the proposed Scottish Marine Regions and the Draft Plan will be developed on this basis.

*Responses number 3 and 31 were in relation to the draft Environmental Report and are not included here. Response number 11 cannot be made public as a Respondent Information Form was not received and number 18 was from an individual that did not give permission to make their response public.

Question 6. How should the pilot plan and/or the marine planning systems facilitate and support integration between the terrestrial and marine planning systems? (See paragraphs 6.16 – 6.17).

Response Number*	Response Summary	Working Group Response
1 Marine Biopolymers	I am no expert in the mechanism for doing this, and there needs to be either a body with a final say e.g. relevant councils or a small committee (I can't think of a better name sorry) with the final say, but the point is that there needs to be an integrated approach such that business developments can be viewed from an overall perspective. This would help improve the chances of (marine) business ventures going ahead, and also in adding value locally to e.g. the Orkney economy – all must be done to encourage “local value added” and not simply have the exporting of raw materials. If both a marine part and a terrestrial part (of a proposed development) are key to its success, then the planning process should facilitate an overall evaluation as opposed to a part by part evaluation	Noted. The Working Group has representatives from Marine Scotland, Highland Council and Orkney Islands Council to ensure that an integrated approach between terrestrial and marine planning systems can be achieved. The Marine Planning Partnerships will, once in place, be the decision making body that will ensure there is integration between terrestrial and marine planning systems in the Regional Marine Plans.
2 Pentland Firth Yacht Club	The onshore, coastal and offshore planning must be integrated. It is no use agreeing an offshore area of low impact when its adjacent landfall has a significant impact and vice versa.	Noted. The Working Group has representatives from Marine Scotland, Highland Council and Orkney Islands Council to ensure that an integrated approach between terrestrial and marine planning systems can be achieved. The Marine Planning Partnerships will, once in place, be the decision making body that will ensure there is integration between terrestrial and marine planning systems in the Regional Marine Plans. Policy 2A deals with the integration of terrestrial and marine planning in the Draft Plan.
4 Orkney Fisheries Association	<p>The pilot plan should attempt to build on and reinforce existing terrestrial policies while recognising that the latter can never be a simple duplicate of the multidimensional and dynamic nature of the water column the sea surface and the sea bed.</p> <p>Extensive involvement of coastal stakeholders in the preparation, implementation and evaluation of the marine spatial plan will ensure successful integration of the two planning systems.</p>	Noted. The Working Group has representatives from Marine Scotland, Highland Council and Orkney Islands Council to ensure that an integrated approach between terrestrial and marine planning systems can be achieved. There will be ongoing consultation with stakeholders during the development of the Draft Plan.
5 Scottish Natural Heritage	We consider effective integration of marine and terrestrial planning to be essential, especially with respect to effective safeguard of intertidal and coastal biodiversity, landscapes and access. There are particularly pressing challenges for safeguard of the coastal zone in PFOW arising from growth of the marine renewables sector and associated demand for terrestrial sites to accommodate	Noted. Policy 2A deals with the integration of terrestrial and marine planning in the Draft Plan. The SEA and HRA processes will be used to provide a means of cross-referencing between Plans.

Question 6. How should the pilot plan and/or the marine planning systems facilitate and support integration between the terrestrial and marine planning systems? (See paragraphs 6.16 – 6.17).

Response Number*	Response Summary	Working Group Response
	<p>infrastructure such as cable landings, electricity substations, and ports and harbours facilities for installation, servicing or repair of devices. We suggest that SEA processes for both marine and terrestrial plans could provide one means of cross-referencing between Plans to ensure that policies are aligned in order to minimise potential cumulative impacts of development in the coastal zone.</p> <p>However, in order to achieve such a vision for coherent marine and terrestrial planning outcomes across multiple (here two) local authority areas, we suggest that collaboration on process and governance issues (such as membership of Regional Planning Partnerships and scheduling of relevant LA Committees' meetings) will be critically important. Effective delivery of policies will also require cross-authority collaboration.</p> <p>Consideration is also needed as to how marine planning should be integrated with other public sector aspirations and / or plans that drive development (e.g. TCE leasing rounds and NRIP). As with terrestrial development plans, there may be opportunities for integration through the SEA process, but this needs to be clearly articulated.</p> <p>This pilot offers opportunities to consider such issues and how they might be addressed in future statutory marine plans.</p>	<p>AP87: Ensure the Strategic Environmental Assessment and Habitats Regulations Appraisal processes cross-reference between Plans and policies where appropriate.</p> <p>Noted. Collaboration on process and governance issues is important and the working group are aiming to keep a record of lessons learned and suggestions for how these processes could be managed. In advance of the formation of Regional Planning Partnerships the Working Group is providing a degree of cross authority collaboration and providing regular committee updates.</p> <p>AP88: Keep a note of lessons learned in relation to process and governance issues.</p> <p>Noted. This has been addressed in Table 4.1 of the PIOP and will be updated if required.</p> <p>Noted.</p>
6 Scottish Environment Protection Agency	<p>We agree that it is important that marine and terrestrial plans are integrated as fully as possible. This is especially important where terrestrial development supports marine development or where proposals are located in the intertidal area, where both consenting regimes may apply.</p>	<p>Noted. The Working Group has representatives from Marine Scotland, Highland Council and Orkney Islands Council to ensure that an integrated approach between terrestrial and marine planning systems can be achieved. There will be ongoing consultation with stakeholders during the development of the Draft Plan.</p>

Question 6. How should the pilot plan and/or the marine planning systems facilitate and support integration between the terrestrial and marine planning systems? (See paragraphs 6.16 – 6.17).

Response Number*	Response Summary	Working Group Response
	<p>While we appreciate it is difficult to achieve in practice, developing and consulting on the relevant local development plans and marine plan at the same time would help ensure consistency of approach. It may also encourage members of the public and developers to engage in the process more fully and have a better understanding of the interrelationship between marine and terrestrial planning.</p> <p>Integration between the marine and terrestrial planning systems could be facilitated based on the Shoreline Management Plan approach which aims to ensure sustainable coastal development.</p>	<p>Noted. This will be taken into consideration and, where possible, development and consultation on the local development plans and the Draft Plan will be co-ordinated.</p> <p>AP89: The Working Group will take into consideration co-ordination of development and consultation on the local development plans and the Draft Plan</p> <p>Noted.</p> <p>AP90: The Working Group will take note of the Shoreline Management Plan approach.</p>
7 Pentland Canoe Club	No comments.	N/A
8 Scottish Water	<p>There will be a degree of overlap between the land planning function and the scope of the marine spatial plans. To facilitate integration, each marine spatial plan should make clear which local planning authorities it relates to.</p> <p>For the area between mean high and low water springs, the marine spatial plans should ensure there is no conflict with existing/emerging Local/Strategic Development plans. In determining the timetable for plan development, cognisance should be given to the terrestrial planning regime. Appropriate consultation should be undertaken to ensure no conflict between land and marine spatial plans. This will be of particular importance when considering proposals for large renewable developments which may require substantial land based infrastructure.</p>	<p>Noted. The Working Group has representatives from Marine Scotland, Highland Council and Orkney Islands Council to ensure that an integrated approach between terrestrial and marine planning systems can be achieved. There will be ongoing consultation with stakeholders during the development of the Draft Plan.</p> <p>Noted. This will be taken into consideration and, where possible, development and consultation on the local development plans and the Draft Plan will be co-ordinated.</p> <p>AP91: The Working Group will take into consideration co-ordination of development and consultation on the local development plans and the Draft Plan.</p>
9	This will require clear guidance, as planners tend to be overloaded even now.	Noted. The Working Group has representatives from

Question 6. How should the pilot plan and/or the marine planning systems facilitate and support integration between the terrestrial and marine planning systems? (See paragraphs 6.16 – 6.17).

Response Number*	Response Summary	Working Group Response
Caithness Kayak Club		Marine Scotland, Highland Council and Orkney Islands Council to ensure that an integrated approach between terrestrial and marine planning systems can be achieved. There will be ongoing consultation with stakeholders during the development of the Draft Plan.
10 Individual	There is a problem with marine litter. A large proportion of this is sourced from shore side activities mainly farming and building. The strong winds here in Orkney do not help the situation. Another source is due to fish farming activities where litter is washed overboard from the boats. The RYA have a voluntary code of practice called the Green Blue possibly this sort of code should be looked at for the fish farming industry. Litter from farming and building would probably need a different approach.	Noted. AP92: The Working Group will take the management of marine litter with a land based source into account in the waste management and marine litter policy in the Draft Plan.
12 Orkney Sustainable Fisheries Ltd.	No comment	N/A
13 Royal Yachting Association	The forthcoming planning circular on the integration of marine and terrestrial planning should provide guidance. It is likely that more changes will be needed in the Local Development Plan at its next quinquennial revision than in the Marine Spatial Plan to facilitate integration. A table listing activities where there is a marine-land interaction might be a useful addition to the plan.	Noted. AP93: The planning circular will be taken into account and the Working Group will consider producing a table of marine-land interactions.
14 Orkney Sea Kayak Association	The overlap of Marine and terrestrial planning can lead to grey areas of responsibility between the two regimes this issue must be fully addressed in order to facilitate and support the mapping of both terrestrial and marine planning systems. The roles of Marine Scotland and the Local Authority need to be clear.	Noted. The Working Group has representatives from Marine Scotland, Highland Council and Orkney Islands Council to ensure that an integrated approach between terrestrial and marine planning systems can be achieved. There will be ongoing consultation with stakeholders during the development of the Draft Plan.
15 Kirkwall Kayak Club	As frequent users of the intertidal zone, we are keen to see the pilot plan and/or marine planning process facilitate a smooth mapping of terrestrial and marine planning systems.	Noted. The Working Group has representatives from Marine Scotland, Highland Council and Orkney Islands Council to ensure that an integrated approach between terrestrial and marine planning systems can be achieved. There will be ongoing consultation with stakeholders during the development of the Draft Plan.

Question 6. How should the pilot plan and/or the marine planning systems facilitate and support integration between the terrestrial and marine planning systems? (See paragraphs 6.16 – 6.17).

Response Number*	Response Summary	Working Group Response
16 SportsScotland	<p>It is important to recognise that in addition to the physical infrastructure required for off shore development, there are other terrestrial impacts of off shore development. This will include impacts on the landscape and potential impacts on coastal processes or on sediment shift that could have terrestrial implications. Changing wave and current regimes that might result from marine development could impact on coastal erosion which from a sport perspective could impact on e.g. coastal path networks of links golf courses. It is important that policy takes account of these relationships between the land and the sea and the implications that development might have.</p>	<p>Noted.</p> <p>We are working closely with OIC and HC planners to ensure that our Plan is compatible with terrestrial Local Plans and vice versa.</p> <p>AP94: The Working Group will consider, where there is information available, the potential terrestrial impacts of off shore development.</p>
17 The Crown Estate	<p>The Planning Issues and Options report makes reference to the National Marine Plan, Scottish Planning Policy and National Planning Framework 3 (NPF3) and we welcome effort to coordinate the plan with the terrestrial and marine planning systems more generally to ensure the development of an integrated planning strategy.</p> <p>The plan should make reference to any national developments identified in the forthcoming NPF3 which fall within the plan area. The Main Issues Report currently identifies a number of possible National Developments within the plan area including the proposal to designate the onshore infrastructure for offshore renewable energy as a National Development. The intention is that designation as a National Development will help assist the timely delivery of these offshore renewable energy projects, therefore it is important that this approach is coordinated with the plan to ensure there is consistency between terrestrial and marine planning in achieving this objective.</p> <p>We also understand that Marine Scotland is due to consult on a Planning Circular as part of their summer consultation programme which will set out how the marine and terrestrial planning systems should interact. The plan should also make specific reference to this, ensuring that it is aligned with the approach proposed in the Planning Circular.</p> <p>It would also be helpful for the plan to make reference to how, from a process perspective, decisions affecting both the marine and terrestrial environments will</p>	<p>Noted.</p> <p>Noted. The Working Group will take the National Planning Framework into account in the Draft Plan.</p> <p>AP95: The National Planning Framework 3 will be taken into account in the Draft Plan.</p> <p>AP96: The planning circular will be taken into account in the Draft Plan.</p> <p>Noted. The Working Group has representatives from Marine Scotland, Highland Council and Orkney Islands</p>

Question 6. How should the pilot plan and/or the marine planning systems facilitate and support integration between the terrestrial and marine planning systems? (See paragraphs 6.16 – 6.17).

Response Number*	Response Summary	Working Group Response
	<p>be made – this does not necessarily mean clarity in terms of policy interpretation, but the process expected to be followed in determining outcomes.</p>	<p>Council to ensure that an integrated approach between terrestrial and marine planning systems can be achieved. There will be ongoing consultation with stakeholders during the development of the Draft Plan.</p> <p>AP97: The Working Group will clarify the process of how decisions affecting the marine and terrestrial environments will be made.</p>
<p>19 RSPB</p>	<p>Wherever possible mechanisms should be established whereby there is regular dialogue between those responsible for marine planning and those for terrestrial. This will help achieve a consistency of approach across the terrestrial and marine plans and provide opportunity for cross cutting themes to be addressed efficiently, avoiding the establishment of conflicting policies. This is in addition to the need for wider stakeholder consultation between those with terrestrial and/or offshore interests.</p> <p>Furthermore, there is a requirement to facilitate a shared evidence base to ensure better understanding of the environmental issues relevant to either/ or/ both plans.</p>	<p>Noted. The Working Group has representatives from Marine Scotland, Highland Council and Orkney Islands Council to ensure that an integrated approach between terrestrial and marine planning systems can be achieved. There will be ongoing consultation with stakeholders during the development of the Draft Plan.</p> <p>Noted. The Draft Plan will provide an evidence base that can be used by both terrestrial and marine planners.</p>
<p>20 Highland Council</p>	<p>Achieving the effective national-level integration between marine and terrestrial planning is vital in order to facilitate regional/local integration. Integration should be promoted not only through plan-making but also in terms of the provision of pre-application advice and the application ('consenting') processes. Continued liaison between Marine Scotland, Highland Council and Orkney Islands Council is crucial. Integration (via Highland Council) with its Local Development Plan for Caithness and Sutherland, and with the CNSRP's Plan, will ensure better integration. See also our comments on Policy area 2 (Integrating marine and coastal development).</p>	<p>Noted. The Working Group has representatives from Marine Scotland, Highland Council and Orkney Islands Council to ensure that an integrated approach between terrestrial and marine planning systems can be achieved. There will be ongoing consultation with stakeholders during the development of the Draft Plan.</p>
<p>21 Scottish Renewables</p>	<p>It is important the relationship between the terrestrial planning regime and the marine planning regime is clear, especially in light of the overlap between the mean high and low waters spring tide mark area.</p> <p>All marine renewable developments have elements of onshore works which are</p>	<p>Noted. The Working Group has representatives from Marine Scotland, Highland Council and Orkney Islands Council to ensure that an integrated approach between terrestrial and marine planning systems can be achieved. There will be ongoing consultation with</p>

Question 6. How should the pilot plan and/or the marine planning systems facilitate and support integration between the terrestrial and marine planning systems? (See paragraphs 6.16 – 6.17).

Response Number*	Response Summary	Working Group Response
	<p>crucial to each development. The terrestrial planning regime should support these works for developments identified in marine plans. As recognised in the issues paper, there are other associated onshore works which will support the industry as a whole, including port and harbour facilities. The terrestrial planning regime must also recognise and support these works to facilitate developments envisaged by the marine planning system.</p> <p>To this end we support the partnership approach to the development of the plan which includes both Highland and Orkney Islands Council.</p> <p>We were pleased to see the clear expression in the third National Planning Framework (NPF3) that it should complement marine planning by addressing the significant onshore development requirements arising from offshore wind, wave and tidal energy. We believe that greater coordination between NPF and the National and Sectorial Marine Plans can be achieved. Therefore, we encourage the Scottish Government to set out in greater detail the process for engagement as both national plans are taken forward.</p> <p>To this end, the Scottish Government is preparing a planning circular on marine and terrestrial planning. This circular should help develop the plan and its relationship with the relevant onshore plans.</p>	<p>stakeholders during the development of the Draft Plan.</p> <p>Noted.</p> <p>Noted. The Working Group will take the National Planning Framework into account in the Draft Plan.</p> <p>AP98: The National Planning Framework 3 will be taken into account in the Draft Plan.</p> <p>Noted.</p> <p>AP99: The planning circular will be taken into account in the Draft Plan.</p>
22 Scottish Wildlife Trust	<p>The need for integration of the two systems cannot be overstated to ensure the plan objectives for the respective regimes are compatible. Aquaculture stands out in this regards as an activity guided by one system but operates in the marine environment. Close collaboration between the authorities involved will be essential – through for example both formal and informal consultation. This could be aided by a specific liaison role within the local authority working across both regimes. The partnership approach taken in the development of the pilot appears to be useful model.</p> <p>Stakeholder engagement could be streamlined by aligning key stages of the two</p>	<p>Noted. The Working Group has representatives from Marine Scotland, Highland Council and Orkney Islands Council to ensure that an integrated approach between terrestrial and marine planning systems can be achieved. There will be ongoing consultation with stakeholders during the development of the Draft Plan.</p> <p>Noted. This will be taken into consideration and, where</p>

Question 6. How should the pilot plan and/or the marine planning systems facilitate and support integration between the terrestrial and marine planning systems? (See paragraphs 6.16 – 6.17).

Response Number*	Response Summary	Working Group Response
	plan development process; for example public consultation.	possible, development and consultation on the local development plans and the Draft Plan will be co-ordinated. AP100: The Working Group will take into consideration co-ordination of development and consultation on the local development plans and the Draft Plan.
23 Scottish Power Renewables	No comment.	N/A
24 Orkney Renewables Energy Forum	It needs to be made clear exactly who is responsible for what and if conflict arises over for example optimal landing points, an arbitrating body should be available with set procedures to resolve potential conflict between the marine and land based disciplines.	Noted. The relevant section of the Draft Plan will be modified to improve clarity and be more comprehensive. AP101: Provide clarity on responsibility for arbitration to resolve conflict between the marine and terrestrial based planning.
25 Scottish Salmon Producers Organisation	<p>The unique position of aquaculture in marine and terrestrial planning means it is important that the Pilot Plan addresses the issue of 'primacy'. Out to 3NM the Town and Country Planning (Scotland) Acts apply to aquaculture, both in terms of planning policy and decisions on planning applications. However the Pilot Plan will also have policies relating to aquaculture within the 3NM limit and out to 12NM. There is therefore an overlap of plans dealing with aquaculture from the MHWS to 3NM. The potential for confusion and inconsistency abounds.</p> <p>The issue has been raised consistently with Scottish Government, Marine Scotland and the Local Authorities in the context of objections to Local Development Plans. SSPO is aware of the Circular in preparation on the interface between the two planning systems. Our understanding is that Scottish Government would prefer to see marine plans take primacy over terrestrial plans in terms of marine development, and we fully understand and support that preference. As this only relates to aquaculture, which is currently being planned for by the local authorities in their Local Development Plans, there is a need for the Pilot to reflect the general principle of this preferred approach.</p>	<p>Noted. The relevant section of the Draft Plan will be modified to improve clarity and be more comprehensive.</p> <p>AP102: The text in relation to aquaculture policies will be clarified to avoid confusion and inconsistency.</p> <p>Noted. The Draft Planning Scotland's Sea Circular (Paragraph 77) states <i>'the Scottish Government expects that, in time, regional marine plans, and any supplementary plans or guidance associated with them, will provide the principal spatial framework for decisions about the location of new aquaculture development. In doing so, regional marine plans will need to take account of the pre-existing terrestrial development plan and any spatial framework, and of the impact of any new</i></p>

Question 6. How should the pilot plan and/or the marine planning systems facilitate and support integration between the terrestrial and marine planning systems? (See paragraphs 6.16 – 6.17).

Response Number*	Response Summary	Working Group Response
	(See also SSPO comments on the Scottish Planning Policy and the National Planning Framework Main Issues Report.)	<p><i>aquaculture development on terrestrial planning objectives. This shift of spatial planning for aquaculture from terrestrial to marine planning should take place in a manner and time to be agreed between terrestrial and marine planning authorities’.</i></p> <p>In advance of the appropriate governance arrangements to enable the preparation of statutory regional marine plans, it is considered appropriate that LDPs should remain the statutory planning policy framework for aquaculture.</p>
26 Orkney Trout Fishing Association	Comments in Question 19 box.	Noted.
27 Colin Kirkpatrick	Comments in Question 19 box.	Noted.
28 Carol Breckenridge	No comments.	N/A
29 Highlands and Islands Enterprise	HIE would encourage Marine Scotland to integrate with terrestrial planning to ensure the development of an integrated planning strategy. There will always be onshore elements involved for each development therefore the terrestrial planning regime should support these works to facilitate development which should include ports and harbours.	Noted. The Working Group has representatives from Marine Scotland, Highland Council and Orkney Islands Council to ensure that an integrated approach between terrestrial and marine planning systems can be achieved. There will be ongoing consultation with stakeholders during the development of the Draft Plan.
30 Dounreay Site Restoration Ltd.	Comments in Question 19 box.	Noted.
32	As there is a huge difference between the environments involved in Terrestrial	Noted. The Working Group has representatives from

Question 6. How should the pilot plan and/or the marine planning systems facilitate and support integration between the terrestrial and marine planning systems? (See paragraphs 6.16 – 6.17).

Response Number*	Response Summary	Working Group Response
Scottish Fishermen's Association	and Marine Planning it is essential that the interface between the two is managed carefully so as not to over emphasise either. It will be important to ensure stakeholder involvement in the process of ICZM.	Marine Scotland, Highland Council and Orkney Islands Council to ensure that an integrated approach between terrestrial and marine planning systems can be achieved. There will be ongoing consultation with stakeholders during the development of the Draft Plan.

*Responses number 3 and 31 were in relation to the draft Environmental Report and are not included here. Response number 11 cannot be made public as a Respondent Information Form was not received and number 18 was from an individual that did not give permission to make their response public.

Question 7. How should the adjoining terrestrial areas be mapped in the pilot marine spatial plan? Do you agree with the proposed key principles set out at paragraph 6.18?

Response Number*	Response Summary	Working Group Response
1 Marine Biopolymers	They seem sensible although there might be some comments relating to any terrestrial industrial developments which would have, not necessarily harmful, but impactful discharges into the marine environment. SEPA might be the best entity to comment on this but perhaps especially sensitive terrestrial/marine vicinity areas could be highlighted.	The effects of discharges to the marine area will be addressed in the Water Environment policy in the Draft Plan.
2 Pentland Firth Yacht Club	We believe Principle 2 would give the most comprehensive coverage but could be the most expensive. Assuming the lead in task was completed comprehensively then Principle 1 would be a suitable (cheaper?) alternative. We disagree with Principle 3. We agree with Principle 4.	Noted.
4 Orkney Fisheries Association	We agree in principal with the proposals with the addition that small local ports like Tingwall, Longhope, Pierowall, Kettletoft, Burry and St Margaret's Hope, which support key small fishing fleets should be recognised and protected for their strategic locations in supporting fishing from both a commercial, socio-economic and safety perspective. Safe reach to fishing grounds and safe radius from port with the limiting factors of vessel size, geographic exposure and gear carrying capacity are factors which link these strategic ports to the different sea environments they serve. These small ports represent an important land-sea link which is not protected in legislation or planning.	AP103: Identify the small local ports in the safeguarding existing ports and harbours policy and appropriately protect these strategic locations and their role in supporting small fishing fleets and other sectors.
5 Scottish Natural Heritage	We would support principles 1, 2 and 4. However, information on zoning of coastal land may be directly relevant to development of realistic (spatial) options for marine developments, so we consider that summary information on coastal land use allocations should ideally be mapped within the MSP, with cross-referencing to the relevant LDP to enable users easy access to more detailed information (i.e. we do not support principle 3).	To ensure that the marine spatial plan is accurate and up to date it is considered appropriate that land use allocations are not identified in the Draft Plan. The details of allocations and land use are appropriately addressed in LDPs. This is not to say that the location of coastal/relevant terrestrial developments and infrastructure won't be identified in the Draft Plan; just that the detailed land use allocations, land use plans in development brief etc will not.
6 Scottish Environment Protection Agency	Principle 1: To ensure integration we consider that it is very important that the adjoining terrestrial areas are appropriately mapped in the marine plan, but agree with the principle of avoiding unnecessary duplication. Principle 2: We support this principle.	Noted. Noted.

Question 7. How should the adjoining terrestrial areas be mapped in the pilot marine spatial plan? Do you agree with the proposed key principles set out at paragraph 6.18?

Response Number*	Response Summary	Working Group Response
	<p>Principle 3: To ensure full integration between the terrestrial and marine environment we consider that it will be necessary to map coastal land use allocations and any other strategic proposals (for example in relation to the National Planning Framework or National Renewables Infrastructure Plan) which have not yet been integrated into local development plans. Without this mapping it will not be possible to get a complete picture of what is already proposed for the area and what further marine development would be achievable. For example a local development plan may propose a development which includes land reclamation works, an industrial allocation may have a number of associated marine discharges and abstractions and a new sub-station could have associated under-sea cabling. All these terrestrial developments could influence what would be a suitable use for the surrounding marine environment. Such information quickly goes out of date and to counteract this you could consider only producing an online version of the maps; this may allow easier update.</p> <p>Principle 4: We support principle 4. In line with our comments above we also suggest that the Plan needs to consider the location of key proposed coastal infrastructure.</p>	<p>To ensure that the marine spatial plan is accurate and up to date it is considered appropriate that land use allocations are not identified in the Draft Plan. The details of allocations and land use are appropriately addressed in LDPs. This is not to say that the location of coastal/relevant terrestrial developments and infrastructure won't be identified in the Draft Plan, just that the detailed land use allocations, land use plans in development brief etc will not.</p> <p>See comment directly above.</p>
7 Pentland Canoe Club	Under Principle 2 (or other appropriate principle) reference should be made to coastal visitor attractions (eg view points) or other points of interest.	AP104: Consider the potential to identify important view points.
8 Scottish Water	<p>Scottish Water strongly agrees with Principle 3 that coastal land use allocations should not be mapped within the marine spatial plan. When terrestrial constraints are mapped for context, it should be made clear that the policies and provisions of Local/Strategic development plans take precedence.</p> <p>The application of marine spatial plans to inform planning application decisions within the coastal zone, and their legal status must be clearly identified within each Marine Spatial Plan. Reference to the relevant marine spatial plan should also be made within the relevant Local Development Plans to aid integration without repetition.</p>	<p>Support noted.</p> <p>The legal status of the marine spatial plan will be explained in the 'How to Use the Plan' section of the Draft Plan. It is intended that the coastal policies within the adjoining LDPs will identify the PFOW MSP as supplementary guidance.</p>
9	Agree	Noted.

Question 7. How should the adjoining terrestrial areas be mapped in the pilot marine spatial plan? Do you agree with the proposed key principles set out at paragraph 6.18?

Response Number*	Response Summary	Working Group Response
Caithness Kayak Club		
10 Individual	I always use Admiralty charts and prefer to have all the information I need in one spot without the chart being cluttered hence prefer Principle 2.	Noted.
12 Orkney Sustainable Fisheries Ltd.	We agree in principal with the proposals with the addition that small local ports like Tingwall, Longhope, Pierowall, Kettletoft, Burry and St Margaret's Hope, which support key small fishing fleets should be recognised and protected for their strategic locations in supporting fishing from both a commercial, socio-economic and safety perspective. Safe reach to fishing grounds and safe radius from port with the limiting factors of vessel size, geographic exposure and gear carrying capacity are factors which link these strategic ports to the different sea environments they serve. These small ports represent an important land-sea link which is not protected in legislation or planning.	AP105: Identify the small local ports in the safeguarding existing ports and harbours policy and appropriately protect these strategic locations and their role in supporting small fishing fleets and other sectors.
13 Royal Yachting Association	The key principles are good. However, there will inevitably be cases where the interpretation of them becomes important. There may be some aspects of coastal land allocation that are relevant for the Marine Spatial Plan. These might refer to sport, recreation, and tourism, and issues related to place making.	Noted.
14 Orkney Sea Kayak Association	Principle 1: Agree. Principle 2: Agree. Principle 3: Further consideration of whether coastal land use allocation should be mapped in the marine spatial plan is required. Principle 4: Agree.	Noted. Noted. To ensure that the marine spatial plan is accurate and up to date it is considered appropriate that land use allocations are not identified in the Draft Plan. The details of allocations and land use are appropriately addressed in LDPs. This is not to say that the location of coastal/relevant terrestrial developments and infrastructure won't be identified in the Draft Plan, just that the detailed land use allocations, land use plans in development brief etc will not. Noted.
15	Principle 1: Agree - no conflict with paddlesport activities foreseen.	Noted.

Question 7

Question 7. How should the adjoining terrestrial areas be mapped in the pilot marine spatial plan? Do you agree with the proposed key principles set out at paragraph 6.18?

Response Number*	Response Summary	Working Group Response
Kirkwall Kayak Club	<p>Principle 2: Agree - no conflict with paddlesport activities foreseen.</p> <p>Principle 3: We advocate further consideration of whether coastal land use allocation should be mapped in the marine spatial plan.</p> <p>Principle 4: Agree - no conflict with paddlesport activities foreseen.</p>	<p>Noted.</p> <p>To ensure that the marine spatial plan is accurate and up to date it is considered appropriate that land use allocations are not identified in the Draft Plan. The details of allocations and land use are appropriately addressed in LDPs. This is not to say that the location of coastal/relevant terrestrial developments and infrastructure won't be identified in the Draft Plan, just that the detailed land use allocations, land use plans in development brief etc will not.</p> <p>Noted.</p>
16 SportsScotland	No comments.	N/A
17 The Crown Estate	<p>We believe this section would benefit from some clarification as it is not entirely clear what is being proposed (e.g. it is not clear whether principle 1 is suggesting that constraints are or are not mapped to avoid duplication). Provision of a table indicating what is proposed to be mapped and what is proposed not to be mapped may assist.</p>	Noted.
19 RSPB	<p>Whilst avoiding duplication of those features mapped in terrestrial plans, it is likely that many terrestrial activities and plans will also directly or indirectly influence the marine area and visa-versa, particularly along inshore and coastal zones. It is recommended, in drafting a list of terrestrial activities/ developments, that a thorough review is undertaken to consider all potential links to activities in the marine area.</p> <p>Overall the proposed key principles seem adequate.</p>	<p>These issues will be addressed in the Integrating coastal and marine development policy in the Draft Plan.</p> <p>Noted.</p>
20 Highland Council	<p>Yes, agreed. The proposed key principles set out a pragmatic way forward. We would however add the following:</p> <p>Firstly, the marine spatial plan should make it clear which constraints are</p>	<p>Noted.</p> <p>AP106: Where constraints are not identified with the</p>

Question 7. How should the adjoining terrestrial areas be mapped in the pilot marine spatial plan? Do you agree with the proposed key principles set out at paragraph 6.18?

Response Number*	Response Summary	Working Group Response
	<p>mapped in the plan and importantly which are not, with reference made to where information about the latter may be found e.g. Local Development Plans;</p> <p>Secondly, key coastal infrastructure to be identified under Principle 4 should include onshore electricity grid for offshore operations, such as interconnectors, hubs and converter stations.</p> <p>Thirdly, the Marine Spatial Plan should be prepared in a way that is consistent between the two Council areas, therefore the key principles should be applied consistently.</p>	<p>Draft Plan, signpost to where relevant information can be accessed.</p> <p>AP107: Identify the location of existing coastal and marine grid infrastructure within the electricity and telecommunications Infrastructure section of the Draft Plan.</p> <p>Noted.</p>
21 Scottish Renewables	We support the proposed key principles outlined in paragraph 6.18	Noted.
22 Scottish Wildlife Trust	We agree the key principles listed.	Noted.
23 Scottish Power Renewables	<p>Question 7, Page 27</p> <p>SPR agree with the key principles.</p>	Noted.
24 Orkney Renewables Energy Forum	As described, although the order of the principles and examples listed should in no way be interpreted as giving any rating of the level of consideration that will be assigned, for example potential impacts on marine archaeology should not by inference take precedence over impacts on housing land allocations.	Noted. These principles have not been presented in order of importance.
25 Scottish Salmon Producers Organisation	Yes.	Noted.
26 Orkney Trout Fishing Association	Comments in Question 19 box.	Noted.

Question 7. How should the adjoining terrestrial areas be mapped in the pilot marine spatial plan? Do you agree with the proposed key principles set out at paragraph 6.18?

Response Number*	Response Summary	Working Group Response
27 Colin Kirkpatrick	Comments in Question 19 box.	Noted.
28 Carol Breckenridge	No comments.	Noted.
29 Highlands and Islands Enterprise	HIE are in agreement with the proposed key principles but would encourage Marine Scotland to provide clearer guidance around Principle 4	Noted. The identification of existing, and appropriate proposed coastal infrastructure, will be clarified in the relevant sections of the Draft Plan e.g. ports and harbours, the electricity and telecommunications infrastructure sections.
30 Dounreay Site Restoration Ltd.	Comments in Question 19 box.	Noted.
32 Scottish Fishermen's Association	The Principles suggested seem to be reasonable, and avoid cluttering each regional plan with unnecessary terrestrial detail, and ensuring clarity within the plan Boundaries.	Noted.

*Responses number 3 and 31 were in relation to the draft Environmental Report and are not included here. Response number 11 cannot be made public as a Respondent Information Form was not received and number 18 was from an individual that did not give permission to make their response public.

Question 8. Are the guiding principles and themes identified in Section 7 appropriate? Are there other guiding principles and themes that should inform the development of the pilot marine spatial plan?

Response Number*	Response Summary	Working Group Response
1 Marine Biopolymers	I think that the paragraphs in Section 7 set out the principles very well	Noted. The Working Group welcomes the positive feedback.
2 Pentland Firth Yacht Club	Generically we agree with the guiding principles. We have some technical / financial concerns over the target of 100% renewable energy if taken as an absolute commandment at the cost of all else. Whilst these are sound principles we recognise that the application will result in compromises. By definition adding a new user to a shared marine space requires existing users to compromise on their use. We do not believe that commercial / revenue exploitation should be the only considerations when addressing these principles.	Noted.
4 Orkney Fisheries Association	<p>These are all appropriate.</p> <p>We welcome that the ‘creation of sustainable communities able to manage and use resources efficiently’ will be a key aim underpinning the objective and policies included in the plan. The pilot plan must recognise that societal benefits associated with the commercial fishing industry are particularly heightened in remote, rural and island communities. As such, any development that results in the shrinkage of the industry will not be in accordance with the principle of sustainable development.</p> <p>In line with the above, islands in particular require, because of their physical unconnected status as opposed to mainland linked coastal areas require, to retain the infrastructure and embedded skills within their populations that enable them to collectively to continue with a core ability to be self-sufficient in the event that external factors prevent food supplies in particular from reaching the islands from elsewhere. Increased dependence on external supplies which are a facet of modern-living undermines island sustainability which can easily be threatened natural events such as weather or man-made events such as conflict or industrial disputes.</p> <p>We would recommend including food security as another of the guiding principles of the plan. We must recognise that fish and shellfish are healthy and nutritious food sources which have a significant role to play in contributing to a</p>	<p>Noted.</p> <p>Noted. The sectoral policies will be developed so that the interests of commercial fisheries are taken into account in consent applications. The Proposed Commercial fisheries section and policy will be the key mechanism for identifying commercial fishing activities and minimising potential conflict with other marine users.</p> <p>Noted.</p> <p>AP108: The role of commercial fisheries in supporting food security will be acknowledged in the relevant section of the Draft Plan. Climate change will be a policy</p>

Question 8. Are the guiding principles and themes identified in Section 7 appropriate? Are there other guiding principles and themes that should inform the development of the pilot marine spatial plan?

Response Number*	Response Summary	Working Group Response
	<p>healthy and balanced diet for our growing population. Global climate change is predicted to reduce the productivity of farmland and increase the volatility of global food supply. Achieving food security in Europe requires a focus on meeting our food demand from sustainable, local sources. Seafood is the largest sector of Scottish food exports; Scotland therefore has a well-established presence and market strength in the sector. In particular, products bearing the 'Orkney' brand are achieving international recognition as being of a high quality, sustainable standard. The plan should aim to build on this.</p>	<p>area within the Draft Plan.</p>
<p>5 Scottish Natural Heritage</p>	<p>We support the inclusion of the sustainable development, the ecosystem approach, climate change, partnership working and stakeholder involvement, and supporting coexistence and multiple use as key principles to guide Plan development. However, we note that sustainable development is implicit in the ecosystem approach (as defined by the Malawi principles²). Hence, one option would be to adopt the ecosystem approach as an overarching principle and sustainable development as a key cross-cutting policy area (see our responses below to cross-cutting policies).</p> <p>We suggest that an additional overarching principle could be developed around the theme of "quality of life" to encapsulate safeguard of the wider natural (including landscapes and seascapes), historic and cultural heritage that contribute to the distinctive experience of living in the coastal zone within PFOW. This aspiration is implicit in the introductory text to the vision (8.1, and also in section 11.7 setting out policy context for biodiversity and natural heritage) but is not explicitly captured in the current overarching principles.</p>	<p>It is acknowledged that there is significant overlap in the definition of sustainable development and the ecosystems approach. The Working Group also recognises that both concepts have separate definitions and statutory origins. Due to the sustainable development duty in the Marine (Scotland) Act 2010, it is considered appropriate that the sustainable development should remain a guiding principle.</p> <p>AP109: A Quality of Life / Well Being policy section will be developed in the Draft Plan.</p>
<p>6 Scottish Environment Protection</p>	<p>Generally we consider the guiding principles and themes identified in this section as appropriate.</p> <p>We would suggest that meeting the requirements of the Water Framework</p>	<p>Noted.</p> <p>Meeting the requirements of the Water Framework</p>

² With respect to the ecosystem approach, we suggest that you may find it helpful to examine the work carried out by SSMEI Clyde Pilot to inform application of the ecosystem approach to marine spatial planning – see http://www.clydeforum.com/images/stories/doc/ssmei/ecosystem-approach-marine-planning_key-findings.pdf

Question 8. Are the guiding principles and themes identified in Section 7 appropriate? Are there other guiding principles and themes that should inform the development of the pilot marine spatial plan?

Response Number*	Response Summary	Working Group Response
Agency	Directive and associated River Basin Management Plan should also be a guiding principle.	Directive and associated River Basin Management Plan will be acknowledged within the Plan's Water Environment policy. AP110: Identify the relevant Water Framework Directive requirements for regional marine planning and address in the Water Environment policy of the Draft Plan.
7 Pentland Canoe Club	No comments.	N/A
8 Scottish Water	Scottish Water invests in Waste Water Treatment Works (WWTW) and collection systems to meet regulatory and environmental requirements based on a number of criteria, including the status of the receiving waters for the final effluent or discharge. Once an asset has been built to meet regulatory standards, it should not be considered feasible for an incompatible activity, such as a shellfish farm, to be developed in the mixing zone. We recommend that the location of incompatible activities is given equal consideration as compatible activities. The development of an incompatible activity near an established legitimate activity, such as a licensed discharge, may lead to requests for enhanced levels of treatment beyond that agreed and set out in the licence; resulting in additional costs in terms of carbon and financial cost.	Noted. AP111: Scottish Water will be consulted to identify the factors that will be taken into account when determining the compatibility of particular activities in relation to water quality. Any potentially incompatible activities in proximity to licensed discharges etc. should be identified at individual project level.
9 Caithness Kayak Club	Agree	Noted.
10 Individual	In the Framework the Echo System Approach is defined as The Act incorporates the ecosystem approach , a concept that is now widely used by international, EU governments and institutions and conservation groups. The Scottish Government publication Sustainable Seas for All defines the	Noted. AP112: Provide a clear definition of the ecosystems approach in the Draft Plan.

Question 8. Are the guiding principles and themes identified in Section 7 appropriate? Are there other guiding principles and themes that should inform the development of the pilot marine spatial plan?

Response Number*	Response Summary	Working Group Response
	<p>Ecosystem Approach as an '<i>integrating and managing the range of demands placed on the natural environment in such a way that it can indefinitely support essential services and provide benefits for all</i>'.</p> <p>In the Consultation Paper the definition is</p> <p>7.3 The Convention on Biological Diversity (CBD COP, 2000, V/6) defines the Ecosystem Approach as: <i>" A strategy for the integrated management of land, water and living resources which promotes conservation and sustainable use in an equitable way."</i></p> <p>These two definitions can mean different things in that equitable meaning fair or just does not necessarily mean "benefits for all". This needs to be corrected to which ever meaning you wish it to be.</p>	
12 Orkney Sustainable Fisheries Ltd.	<p>These are all appropriate.</p> <p>We welcome that the 'creation of sustainable communities able to manage and use resources efficiently' will be a key aim underpinning the objective and policies included in the plan. The pilot plan must recognise that societal benefits associated with the commercial fishing industry are particularly heightened in remote, rural and island communities. As such, any development that results in the shrinkage of the industry will not be in accordance with the principle of sustainable development.</p>	<p>Noted.</p> <p>Noted. The sectoral policies will be developed so that the interests of commercial fisheries are taken into account in consent applications. The Proposed Commercial fisheries policy will be the key mechanism for identifying commercial fishing activities and minimising potential conflict with other marine users.</p>
13 Royal Yachting Association	<p>RYAS agrees with the guiding principles and themes. Supporting coexistence and enabling multiple use of marine space is especially important in our view and we would be happy to contribute to the development of this. We note that the current Scottish Planning Policy encourages the sharing of facilities between aquaculture and recreation where possible and the RYA/RYS response to the current SPP consultation suggests widening the scope of this to other marine activities.</p>	<p>Noted.</p>
14	<p>We welcome the guiding principles and themes and are pleased to see that</p>	<p>Noted.</p>

Question 8. Are the guiding principles and themes identified in Section 7 appropriate? Are there other guiding principles and themes that should inform the development of the pilot marine spatial plan?

Response Number*	Response Summary	Working Group Response
Orkney Sea Kayak Association	<p>close engagement with local organisations and communities will be encouraged.</p> <p>7.8 appears to imply that certain areas would be reserved for certain activities. This should not be the case. All development in the marine environment should be considered on its own merits irrespective of the type of development that is proposed. This leads to a more thorough consultation process at the application stage, rather than some sectors appearing to be frozen out. Designating areas gives the appearance that a particular sector already has a foot in the door.</p>	<p>Noted. Promoting coexistence is the key principle supporting Guiding Principle 5 in the PIOP.</p> <p>AP113: Agreed that further clarity is needed. Emphasis promoting coexistence and multiple use of marine space in Guiding Principle 5 in the PIOP (Supporting coexistence and enabling multiple use of marine space).</p>
15 Kirkwall Kayak Club	<p>We welcome the guiding principles and themes and are pleased to see that close engagement with local organisations and communities will be encouraged.</p> <p>Although it is not our understanding that the intention of theme 5 (7.8) is to promote certain activities in specific areas whilst excluding those activities in other areas, we are concerned that the wording of this theme could be interpreted so as to support the creation of exclusion zones for activities including paddlesport.</p>	<p>Noted.</p> <p>Noted. Promoting coexistence is the key principle supporting Guiding Principle 5 in the PIOP.</p> <p>AP114: Agreed that further clarity is needed. Emphasis promoting coexistence and multiple use of marine space in Guiding Principle 5 in the PIOP (Supporting coexistence and enabling multiple use of marine space).</p>
16 SportsScotland	<p>In relation to partnership working and stakeholder involvement, it is important to work with more than <i>local</i> organisations and communities. Please see our answer to question 3.</p>	<p>Noted.</p>
17 The Crown Estate	<p>See response to question 9 below.</p>	<p>Noted.</p>
19 RSPB	<p>We welcome and support the guiding principles and themes presented in Section 7. Seeking to support the aims and principles of sustainable development through implementation of the MSFD is key to ensuring successful management that meets the needs of the local area whilst protecting and enhancing the marine and coastal environment.</p> <p>Principle 3 – Climate Change</p>	<p>Noted.</p>

Question 8. Are the guiding principles and themes identified in Section 7 appropriate? Are there other guiding principles and themes that should inform the development of the pilot marine spatial plan?

Response Number*	Response Summary	Working Group Response
	<p>The focus on marine renewable energy technology is one element which the plan seeks to contribute towards reducing climate change impacts. However, the Plan can and should also play a crucial role in establishing a framework for adapting to the effects of climate change. Flexibility and adaptability must be built into the plan to ensure the challenges posed by climate change are identified and detected early and responded to in a manner that protects the environment, increases its resilience and where possible enhances its integrity. This approach will support the aims and objectives of the MSFD.</p> <p>Principle 5 – Co-existence</p> <p>This could be extended to consider co-location in terms of human activities within designated natural heritage sites. This is particularly relevant to marine renewables and is important in ensuring projects are sited in the least sensitive areas. Establishing clear guidance on which activities may be compatible with which designation will offer greater clarity and environmental protection.</p> <p>This approach requires research and monitoring to help define compatibility. In some cases potential environmental impacts of devices and activities may not be well understood. However, as further information becomes available this should inform future iterations of the plan.</p>	<p>AP115: Principle 3 in the PIOP (Climate Change) will be developed further in the Draft Plan to highlight the importance of adapting to climate change and building in flexibility and adaptability into the Draft Plan objectives and policies. Climate change will be a policy area within the Draft Plan.</p> <p>It would be difficult to provide robust guidance on the compatibility of human activities with designated site conservation objectives at the strategic level of developing a marine spatial plan. Only with the details of a particular project (e.g. the technology, array layout) would it be possible to accurately consider compatibility issues within designated sites. It is proposed that the Draft Plan will set out the key considerations that will be taken into account when assessing a S36/marine licence application within a designated site or developments that could impact upon the conservation objectives of a designated site.</p> <p>AP116: Set out the framework for monitoring and reviewing the implementation and effectiveness of the pilot marine spatial plan in the Draft Plan. This work will likely be taken forward by the subsequent Marine Planning Partnerships.</p>
20 Highland Council	Yes, agreed. The Council particularly welcomes the inclusion of Sustainable Development amongst the guiding principles and themes and the recognition within that of the need to support economic growth and job creation whilst	Noted. Table 9.1 of the PIOP identifies key sectors and their aspirations for growth. This sectoral information, and the consultation responses to this anticipated

Question 8. Are the guiding principles and themes identified in Section 7 appropriate? Are there other guiding principles and themes that should inform the development of the pilot marine spatial plan?

Response Number*	Response Summary	Working Group Response
	<p>ensuring environmental protection. However, the Plan could refer more overtly to the sectors which it is anticipated will be seeking significant growth within the Plan area (or outwith the Plan area but dependent upon marine facilities such as ports and harbours within it) and to the importance of accommodating growth. This is particularly relevant given the context of other work already undertaken or in progress to plan for these sectors, for regeneration and for a post-Dounreay economy, such as: the work of CNSRP, the John O’Groats Masterplan, Harbour expansions, Scrabster Enterprise Park, and Call for Sites for land for employment uses to support marine renewables sector in North Highland.</p>	<p>growth, will inform the development of the Draft Plan Sectoral Policies.</p>
21 Scottish Renewables	<p>We support the guiding principles as set out in section 7. Principle 3 should also contain reference to the Scottish Government’s own climate change targets as introduced under the Climate Change (Scotland) Act 2009 and the Scottish Government’s energy decarbonisation target as proposed in the offshore wind route map and set out in ‘Meeting the Emissions Reductions Targets 2013-2027: The second report on proposals and policies’ (RPP2).</p>	<p>AP117: Climate change will be a policy area within the Draft Plan.</p>
22 Scottish Wildlife Trust	<p>We support the guiding principles and themes in Section 7. Under climate change there we seek assurance that adaptation to climate change will be included as a guiding principle alongside mitigation – a requirement on Ministers and public authorities under the Marine (Scotland) Act.</p> <p>We fully endorse the ecosystems-approach to marine planning and believe it should be aimed at achieving ecological objectives that maintain or restore (a) native species diversity, (b) habitat diversity and heterogeneity, (c) populations of keystone species and (d) connectivity.</p>	<p>AP118: Climate change will be a policy area within the Draft Plan.</p> <p>AP119: Consider these stated objectives when defining and delivering the ecosystems approach in the Draft Plan.</p>
23 Scottish Power Renewables	<p>Question 8, Page 29</p> <p>SPR agree with coexistence as a principal; however, we cannot agree with coexistence in relation to specific developments until the management measures being proposed are fully set out and the implications of coexistence are fully known.</p>	<p>Noted.</p>
24 Orkney	<p>The importance of providing a supporting electricity transmission network sufficient to enable the realisation of Scotland’s ambitious renewable generation</p>	<p>We acknowledge the importance of providing an electricity transmission network to enable the growth of</p>

Question 8. Are the guiding principles and themes identified in Section 7 appropriate? Are there other guiding principles and themes that should inform the development of the pilot marine spatial plan?

Response Number*	Response Summary	Working Group Response
Renewables Energy Forum	target should be a guiding principle.	the renewable sector. Sector specific aspirations will be addressed within the Draft Plan. The electricity and telecommunications infrastructure policy in the Draft Plan will specifically addresses the importance of developing electricity infrastructure to support the development of marine renewable energy projects. AP120: Emphasise the importance of developing the electricity transmission network within the Draft Plan's proposed policy on electricity infrastructure.
25 Scottish Salmon Producers Organisation	(i) Yes (ii) No	Noted support for Guiding Principle 1. Guiding Principle 2, delivering an Ecosystems Approach to marine management is supported through the MSFD and the Draft National Marine Plan.
26 Orkney Trout Fishing Association	Comments in Question 19 box.	Noted.
27 Colin Kirkpatrick	Comments in Question 19 box.	Noted.
28 Carol Breckenridge	It will destroy the natural habitat and the views of the North East coast.	Noted. It is unclear exactly what is being referred to with regards the proposed Guiding Principles. It is therefore difficult to provide a specific response.
29 Highlands and Islands Enterprise	HIE would encourage Marine Scotland to ensure the guiding principles for all themes are adhered to but paying particular attention to 7.1 – Sustainable Development.	Noted.
30 Dounreay Site Restoration	Comments in Question 19 box.	Noted.

Question 8. Are the guiding principles and themes identified in Section 7 appropriate? Are there other guiding principles and themes that should inform the development of the pilot marine spatial plan?

Response Number*	Response Summary	Working Group Response
Ltd.		
32 Scottish Fishermen's Association	The principles and themes laid out in section 7 are missing any reference to the public right to fish established in statute, which is an essential defence for an important food producing industry.	A right (or entitlement) to fish has been developed through common law (or case law) but is not an absolute right and can be subject to statutory restriction. Any development that is likely to have an impact on fishing would require the developer to liaise with fishermen using that area and take their concerns into account. Objections raised would be noted in the recommendations to Ministers to inform their determination decision. Fishermen would have the opportunity to raise issues during the consultation process for developments and, if necessary, a liaison group would be set up to help resolve issues between the developers and fishermen. For the renewables industry there is guidance in place to assist this process: the Fishing Liaison with Offshore and Wet Renewables (FLOWW) Best Practice Guidelines.

*Responses number 3 and 31 were in relation to the draft Environmental Report and are not included here. Response number 11 cannot be made public as a Respondent Information Form was not received and number 18 was from an individual that did not give permission to make their response public.

Question 9. What is your vision for the future of the Pentland Firth and Orkney Waters area? What would you like the area to be like in 20 years time?

Response Number*	Response Summary	Working Group Response
1 Marine Biopolymers	I would like to see a balanced situation in the Pentland/Orkney waters area – by that I mean that all the key aspects regarding current and future developments (or even non-developments if they would cause problems) should have, and know their place, within the total Marine environment. The danger will be if any one single activity or priority becomes imbalanced vs. the rest – that would not only stoke up resentment but would probably lead over the longer term to unintended harmful consequences. I have no objections whatsoever to Marine Renewables development, but there is a danger that it could overwhelm other economically beneficial activities in the area. Nature also has a habit of “biting back” so great care needs to be taken to achieve and retain a dynamic but manageable balance	These comments will inform the preparation of the vision within the Draft Plan.
2 Pentland Firth Yacht Club	<p>The PFYC as an organisation generally supports the exploitation of the Pentland Firth and Orkney Waters for commercial purposes as long as this is carried out in a caring manner that protects the environment, the amenities and allows existing users continuing access – although with acceptable compromises.</p> <p>We would be resistant to arguments from developers and their investors that they must have more than their share to make a project financially viable if this means the compromises are unacceptable to existing users.</p> <p>We don't believe that exploitation or revenue or job creation should take priority but should be part of the mix.</p> <p>So we would like to see a vibrant area rich in flora, fauna, archaeology, geology etc. with a mix of uses that are successful both commercially and socio-economically where no user can dominate; and existing users have accepted reasonable compromises to allow these new users.</p>	All these comments will inform the preparation of the vision within the Draft Plan.
4 Orkney Fisheries Association	A highly sustainable commercial inshore fishery with its own 'bottom up' governance over both wild fin-fish, shellfish stocks and effort where sufficient economic returns and status of the industry are such that young people are keen to join the industry. A renewed confidence and affirmation of the importance of fishing. An environment of minimal disruptive industrial permanence.	These comments will inform the preparation of the vision within the Draft Plan.
5	We consider that the specific vision for the Plan area should be developed	These comments will inform the preparation of the vision

Question 9. What is your vision for the future of the Pentland Firth and Orkney Waters area? What would you like the area to be like in 20 years time?

Response Number*	Response Summary	Working Group Response
Scottish Natural Heritage	primarily through consultation with local communities. However, in line with our mission statement (All of Nature for All of Scotland) and remit, our aspiration would be that the vision developed for PFOW should value the area's valuable and distinctive natural heritage and enhance opportunities for this to contribute to the well-being of local residents and visitors. More specifically, we refer you to our updated Natural Heritage Futures prospectus for Orkney and North Caithness (see original 2002 document at http://www.snh.gov.uk/docs/A306319.pdf with 2009 update at http://www.snh.gov.uk/docs/A306318.pdf). This prospectus describes what is distinctive to this region, provides a vision for the natural heritage for 2025, and sets out objectives and actions required to pursue that vision.	within the Draft Plan and will be shaped by all the consultation comments provided.
6 Scottish Environment Protection Agency	All water bodies in the area are currently at good or high ecological status. SEPA's vision for 20 years time is for the good quality of the water environment in the area to be maintained. Opportunity for enhancement and improved working practices will have been taken wherever possible, for example in relation to reducing litter on beaches from shipping and visitors and ensuring that the spread of marine non native species has been avoided.	These comments will inform the preparation of the vision within the Draft Plan.
7 Pentland Canoe Club	No comments.	Noted.
8 Scottish Water	Scottish Water has no comment	Noted.
9 Caithness Kayak Club	Having seen only minor changes in the last 40 years, I think we are entering a period of much more rapid change. This could lead to rampant exploitation if not handled effectively. I would hope for a balance of energy production, existing usage and protection of the wildlife and habitats. I would hope that the area could become a model of success for other areas, balancing out the industrial, commercial, environmental and cultural aspects of this unique area where the waters of the Atlantic and the North Sea merge.	These comments will inform the preparation of the vision within the Draft Plan.
10 Individual	There are great opportunities for the marine tourist industry. I could see Orkney as being the jumping off point for cruising around Shetland and Norway. For this to happen there would need to be an increase in facilities such as yacht storage	All these comments will inform the preparation of the vision within the Draft Plan.

Question 9. What is your vision for the future of the Pentland Firth and Orkney Waters area? What would you like the area to be like in 20 years time?

Response Number*	Response Summary	Working Group Response
	<p>and maintenance. The building of the marinas has been a good start but with the correct vision there is still a long way to go.</p> <p>Coupled with the above there could be various add-ons. I would like to see the various RYA training schemes spread out to cover all the small boat activities so that everybody who goes on the water has had some form of training. This could also cover the Green Blue scheme.</p> <p>Since the Tall Ships in Shetland there has been some activity in enabling young people to get some experience in sea training on board various training ships. This needs to be expanded to take in schools and youth clubs. Part of the costs of this can come from the children and clubs raising the money from such things as bag packing. A small sail training ship such as the Shetland STS Swan could also be used by the various firms associated with renewables for bonding exercises.</p> <p>Fin fish farming could see a large change with the development of onshore farming. This would do away with most of the pollution hence cleaner waters and less infectious diseases with wild fish.</p> <p>Orkney Harbour's tugs and pilot boats based at the Scapa pier use a lot of fuel meeting ships in the Pentland Firth, Flotta and Stromness. In order to cut down on pollution and costs caused by burning fuel they need to be based in Flotta. It is also not without the bonds of imagination that these same tugs should be used in the renewables industry.</p> <p>The marine renewables industry have yet to find out how much power they can generate using arrays. The latest findings, based on theory, indicate that tidal generation is less than originally estimated. This does seem to be a case of where 1 +1 does not equal 2. If this is the case for wave as well then maintenance resources may be far less than originally thought.</p>	
12 Orkney Sustainable	A highly sustainable commercial inshore fishery with its own 'bottom up' devolved governance over both wild fin-fish and shellfish stocks, and where these devolved management measures directly lead to greater economic returns	These comments will inform the preparation of the vision within the Draft Plan.

Question 9. What is your vision for the future of the Pentland Firth and Orkney Waters area? What would you like the area to be like in 20 years time?

Response Number*	Response Summary	Working Group Response
Fisheries Ltd.	for inshore fishermen. Shared and non-conflicting use of marine space across traditional and “new” industry sectors.	These comments will inform the preparation of the vision within the Draft Plan.
13 Royal Yachting Association	RYAS acts to protect its members’ rights of navigation and to ensure their safety. It also supports the development of its affiliated clubs and teaching establishments. The PFOW area is an important area for recreational boating both for local people and for visitors, although it is unlikely to ever be as busy as, for example, the west coast. Indeed, a low density of recreational craft is part of the attraction of parts of the PFOW area. Our vision is for a sustainable marine recreational sector in an area prized for its natural and human heritage.	These comments will inform the preparation of the vision within the Draft Plan.
14 Orkney Sea Kayak Association	We hope the PFOW area will, as a result of a well-formulated marine spatial plan, succeed in being a vibrant and prosperous community with through sustainable development and protection of natural, cultural and historic assets be enjoyed by all recreational users.	These comments will inform the preparation of the vision within the Draft Plan.
15 Kirkwall Kayak Club	We hope that in decades to come the PFOW area will, as a result of a well-formulated marine spatial plan, succeed in being a vibrant and prosperous community through sustainable development and protection of natural, cultural and historic assets. We also hope that people are able to continue to enjoy this environment through paddlesport.	These comments will inform the preparation of the vision within the Draft Plan.
16 SportsScotland	We would like to see a fair and sustainable balance between different sectors. A full understanding of the recreational sector, and clarity that this includes sport. We would like to see the recreation sector promoted and supported and opportunities for its sustainable growth supported and facilitated. We want to see the sector involved and consulted on the decision making processes. It is important that the special qualities of the area for sport and recreation are protected and enhanced.	These comments will inform the preparation of the vision within the Draft Plan.
17 The Crown Estate	We believe that the vision for the PFOW area should reflect the strategic importance of the PFOW in terms of wave and tidal resource and the key role the area will play in the development of commercial scale wave and tidal energy, the success of which will form the cornerstone of the growth of the wave and	These comments will inform the preparation of the vision within the Draft Plan.

Question 9. What is your vision for the future of the Pentland Firth and Orkney Waters area? What would you like the area to be like in 20 years time?

Response Number*	Response Summary	Working Group Response
	<p>tidal industry in Scotland. The plan’s vision and objectives should also recognise the economic opportunities that the wave and tidal industry offers to Caithness, Sutherland and Orkney as well as the importance of the area’s contribution to the wider Scottish economy.</p> <p>In addition to this, the vision and objectives for the plan should reference the need to tackle climate change, and in particular reduce emissions of the greenhouse gases that contribute to it in accordance with the Marine (Scotland) Act, which states that Scottish Ministers and public bodies must act in a way best calculated to mitigate, and adapt to, climate change so far as is consistent with the purpose of the function concerned. The development of wave and tidal energy in the PFOW area has the potential to contribute to the targets for emissions reductions through the mitigation of climate change impacts via the displacement of greenhouse gas emissions.</p> <p>Given the role of the plan in delivering the objectives of Scotland’s National Marine Plan, we would urge complementarity between the two documents. The National Marine Plan summarises the Scottish Government’s vision for the marine environment as <i>“clean, healthy, safe, productive and biologically diverse oceans and seas, managed to meet the long term needs of nature and people”</i>. This vision is shared by the four UK administrations and the Marine Policy Statement (MPS), which is jointly adopted by the administrations, is an important step in achieving the vision.</p> <p>Delivery of the Scottish Government’s vision will be enhanced further by the implementation of the EU Marine Strategy Framework Directive which sets the framework for Good Environmental Status (GES) to be achieved or maintained by 2020. The Directive sets out 11 descriptors which provide the outcomes that would constitute GES.</p> <p>Therefore, in order to ensure consistency between the National Marine Plan and the plan, we would recommend that the plan sets the same objectives as the National Marine Plan to help deliver the Scottish Government’s vision for the</p>	<p>These comments will inform the preparation of the vision and objectives within the Draft Plan.</p> <p>AP121: Climate change will be a policy area within the Draft Plan.</p> <p>Noted.</p> <p>Noted.</p> <p>The marine spatial plan will be consistent with the National Marine Plan and the MPS. It is not considered appropriate for the Draft Plan to have the same</p>

Question 9. What is your vision for the future of the Pentland Firth and Orkney Waters area? What would you like the area to be like in 20 years time?

Response Number*	Response Summary	Working Group Response
	marine environment.	objectives as the NMP as regional marine planning should articulate a regionally derived vision and objectives.
19 RSPB	The vision should align with that set out in the UK Marine Policy Statement where the PFOWs are ' <i>clean, healthy, safe, productive and biologically diverse.</i> ' The Scottish Government's vision for the marine environment extends the UK Policy to include ' <i>...managed to meet the long term needs of nature and people.</i> '	The marine spatial plan vision will be consistent with the National Marine Plan and the MPS.
20 Highland Council	<p>Whilst terrestrial planning does not extend across the greater part of the marine spatial plan area, the vision of the terrestrial plans (e.g. Local Development Plans) will be relevant.</p> <p>For example, pages 13-17 of the Highland-wide Local Development Plan set out a vision for Highland followed by vision and spatial strategy for Caithness and Sutherland; see http://www.highland.gov.uk/NR/rdonlyres/93148364-903F-48D3-AA7C-81468BC05C95/0/HwLDP_WEB.pdf</p> <p>Additionally the Council is in the early stages of preparing the Caithness and Sutherland Local Development Plan and one of the outputs from the Wick and Thurso Charrettes held in February 2013 is an early draft 'Caithness Vision' which will be further developed and consulted upon as we move forward with preparation of the LDP; see http://www.highland.gov.uk/NR/rdonlyres/4BB3DB50-7844-4501-90E6-C796488DF942/0/ReportoftheWickandThursoCharrettes4CaithnessMEDIUMRES.pdf</p> <p>Furthermore the CNSRP's vision for Caithness and North Sutherland will also be relevant; see http://www.cnsrp.org.uk/wp-content/plugins/download-monitor/download.php?id=82</p> <p>The vision to be prepared for the future of the Pentland Firth and Orkney Waters area should align with and fit these.</p>	<p>Noted.</p> <p>This information will inform the preparation of the vision and objectives within the Draft Plan.</p> <p>Noted</p> <p>Noted.</p> <p>Noted.</p>

Question 9. What is your vision for the future of the Pentland Firth and Orkney Waters area? What would you like the area to be like in 20 years time?

Response Number*	Response Summary	Working Group Response
21 Scottish Renewables	<p>Scotland is home to some of the best offshore renewable energy resources in the world and the Pentland Firth and Orkney Waters are the jewel in the crown of our huge marine energy resource. A recent study by Oxford University confirmed that the Firth is the best site in the world for tidal energy.</p> <p>We would like to see the area fully utilizing this huge resource and securing the full range of benefits that flow from it.</p> <p>Recent work by Baringa has shown that with the right policy and financial support, the development of renewable generation in the PFOW area could secure significant socioeconomic benefits to the local economies through the creation of direct, indirect and induced jobs. The analysis suggests that by 2020 some 416 full time jobs could be created in Orkney, and by 2030, that number could rise to over 4,500.</p> <p>According to the report, the vast majority of these jobs in Orkney would flow from wave and tidal generation which is labour intensive in the early years, providing the opportunity to develop local supply chains and export expertise.</p> <p>In addition, the development of the wave and tidal energy in the PFOW area will play a crucial role in the achievement of both the Scottish Government's decarbonisation and climate change targets.</p>	<p>Noted.</p> <p>Noted.</p> <p>This information will inform the preparation of the vision and objectives within the Draft Plan.</p> <p>Noted.</p> <p>Noted.</p> <p>AP122: Climate change will be a policy area within the Draft Plan.</p>
22 Scottish Wildlife Trust	<p>The vision should be consistent with the Scottish Government's vision of '<i>clean, healthy, safe, productive, biologically diverse marine and coastal environments, managed to meet the long-term needs of people and nature.</i>'</p>	<p>Noted.</p>
23 Scottish Power Renewables	<p>Page 30, Paragraph 8.1</p> <p>It should be stated clearly over what period the plan is likely to cover. For instance, is the plan to be reviewed every 5-years or will it be a 20-year plan (as mentioned in Paragraph 8.7)? The chosen period will have significant implications over the assumptions in the plan; particularly in relation to marine</p>	<p>AP123: Set out the framework for monitoring and reviewing the implementation and effectiveness of the pilot marine spatial plan in the Draft Plan. This work will likely be taken forward by the subsequent Marine</p>

Question 9. What is your vision for the future of the Pentland Firth and Orkney Waters area? What would you like the area to be like in 20 years time?

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	<p>renewables as this is a fast moving sector from a technology perspective and is likely to go through several iterations in the coming years and decades.</p> <p>Page 31, Paragraph 8.7</p> <p>A 20-year look ahead is ambitious. Is this to be re-visited every 5-years?</p> <p>Question 9, Page 31</p> <p>In 20-years time it would be good to see that we have managed to capture some of the marine energy within the area through renewable sources without interference to current activities.</p>	<p>Planning Partnerships.</p> <p>The Marine (Scotland) Act does not specify a statutory review period. It is anticipated that the Plan will be review approximately every 5 years following adoption.</p> <p>This work will likely be taken forward by the subsequent Marine Planning Partnerships.</p>
24 Orkney Renewables Energy Forum	That Pentland Firth and Orkney waters become established as the world leading location for the production of energy from the sea. And that this achievement is safeguard by the continuous adoption of a positive approach to further exploitation of our sustainable resources to the benefit of Orkney and it's neighbouring communities.	These comments will inform the preparation of the vision within the Draft Plan.
25 Scottish Salmon Producers Organisation	SSPO would wish to see the PFOW area as one in which the salmon farming industry has confidence to invest, to create jobs and to create sustainable economic growth in remote rural and island communities, as it has been doing for the past 40 years with great success.	These comments will inform the preparation of the vision within the Draft Plan.
26 Orkney Trout Fishing Association	Comments in Question 19 box.	Noted.
27 Colin Kirkpatrick	Comments in Question 19 box.	Noted.
28 Carol Breckenridge	Windfarms especially will destroy the North East for very little benefit and to the detriment of health and wellbeing for man and nature.	These comments will inform the preparation of the vision within the Draft Plan.

Question 9. What is your vision for the future of the Pentland Firth and Orkney Waters area? What would you like the area to be like in 20 years time?

Response Number*	Response Summary	Working Group Response
29 Highlands and Islands Enterprise	HIE's vision for the future of the Pentland Firth and Orkney Waters is to continue its leading edge of being at the forefront of wave and tidal energy development. We would like to have fully commercialised sites, home to arrays of wave and tidal devices producing up to 1.6GW of marine energy feeding into the national grid, the area to be a centre of excellence for Research, Development and Deployment; quality ports, harbours and onshore infrastructure and for the economy of the Pentland Firth and Orkney Waters to be buoyant, providing high value jobs combined with quality of life in the area. We would also like to see a commercially prosperous supply chain and operations and maintenance industry situated in the HIE region. HIE is currently working with Scottish Enterprise to deliver NRIP 3 which focuses on the infrastructure needs of the marine sector, including within the PFOW area, this will be published in September 2013.	These comments will inform the preparation of the vision within the Draft Plan.
30 Dounreay Site Restoration Ltd.	Comments in Question 19 box.	Noted.
32 Scottish Fishermen's Association	The SFF would share a vision of a productive, sustainable economy in the PFOW area, based on co-existence of the different economic users and demands on the area.	These comments will inform the preparation of the vision within the Draft Plan.

*Responses number 3 and 31 were in relation to the draft Environmental Report and are not included here. Response number 11 cannot be made public as a Respondent Information Form was not received and number 18 was from an individual that did not give permission to make their response public.

Question 10. Are there existing marine activities that you think should be safeguarded now and into the future? For example, commercial fisheries, ferry services and recreational activities.

Response Number*	Response Summary	Working Group Response
1 Marine Biopolymers	Provided that these existing marine activities have a measurable benefit, in economic and social terms, and that they are not damaging to the environment (especially), then all existing activities indicated e.g. inshore fishing, ferry transport, allowed recreation activities should be reasonably safeguarded but that should not be to the detriment of other future developments, which may or may not even have been currently envisioned or identified, which might have better benefits for the community and the environment. It is important that a degree of dynamics is encouraged	Noted.
2 Pentland Firth Yacht Club	Exploitation of the assets of the area should not be carried out such that any existing user is discouraged or phased out. From a PFYC perspective we would accept some sensible curtailment of our freedom to sail anywhere at any time as long as this curtailment is reasonable. Any changes must be done in a manner that is not unduly hazardous to navigation bearing in mind that sailing vessels and small craft transiting these waters during high flow conditions may not be under command. Both consenting authorities and developers must accept responsibility for introducing new artificial hazards and not use legislation to protect themselves from this responsibility. Simply marking a new hazard on a chart should not relieve them of responsibility should a vessel become damaged or wrecked. These are not normal navigational waters and vessels may not be able to avoid new hazards in what was previously a clear passage.	Noted. AP124: The hazards relating to navigational conditions in the PFOV, particularly in relation to sailing vessels and small craft, should be acknowledged and addressed in the operation and safety of shipping and navigation policy in the Draft Plan.
4 Orkney Fisheries Association	The commercial fishing industry is a long-standing and established entity in the Orkney Islands and therefore integral to island identity. Fishing provides practical and rewarding autonomous jobs for the traditional working sector of the population. As well as providing more than 370 direct jobs on vessels, the Orkney fishing sector supports many inshore activities too. For example the crab processing factory run by The Orkney Fisherman's Society employs around 70 people. A similar factory in Westray provides around 20 jobs. These jobs must be safeguarded now and into the future to maintain the viability and cohesiveness of communities in Orkney.	Noted. AP125: The Draft Plan, and particularly the Commercial Fisheries policy and/or supporting text, will acknowledge the cultural and commercial significance of the commercial fishing industry to Orkney, Caithness and Sutherland. AP126: The Commercial Fisheries and Ports and Harbours policy and/or supporting text will establish broad support for development of facilities and infrastructure that support the sustainable growth of the commercial fisheries sector.

Question 10. Are there existing marine activities that you think should be safeguarded now and into the future? For example, commercial fisheries, ferry services and recreational activities.

Response Number*	Response Summary	Working Group Response
		<p>AP127: The Sustainable Development policy section will be drafted to ensure the economic benefits of existing economic activity, added value and new development proposals are assessed. Consideration will also be given to developing a policy to assess economic impacts.</p>
5 Scottish Natural Heritage	<p>Our view is that marine planning has a key role in integrating and managing all legitimate activities in the marine and coastal environment while safeguarding the natural heritage. A central challenge in achieving this is to ensure that the balance arrived at takes account of all such activities, and we would be particularly concerned to ensure that opportunities for informal recreational activities (e.g. walking, snorkelling, kayaking) are not compromised by the drive for increased commercial use and, where possible, are enhanced through the Plan policies (e.g. through identification of opportunities to improve coastal and marine access).</p>	<p>Noted. This will be addressed in the Draft Plan. Consideration will be given to having two policies, one each for Tourism and Recreation, that will be developed to ensure that due regard is given to the interests of tourism and recreational users when assessing marine development consent applications. These policies will be developed in partnership with land based planning authorities to ensure a coordinated policy approach is taken. This will aim to ensure that land based facilities (e.g. changing facilities) at developments such as slipways are supported by terrestrial planning policy.</p> <p>AP128: Develop separate Tourism and Recreation policies that should support the enhancement of recreational facilities, coastal and marine access.</p>
6 Scottish Environment Protection Agency	<p>We consider that fisheries need to be safe guarded against the impacts of marine non native species.</p> <p>Although there are only two designated bathing beaches in the area (Turso and Dunnet) there are a number of other small beaches used by both locals and visitors which you may specifically wish to highlight for protection.</p>	<p>AP129: The Non Native invasive Species section in the Draft Plan should consider measures to raise awareness and use of biosecurity measures for all marine users.</p> <p>AP130: Beaches for recreational use will be identified in the Tourism and Recreation study and these data will be used to inform the Draft Plan.</p>
7 Pentland Canoe Club	<p>Scotland has been promoting venture tourism. The area offers great potential for water based adventure tourism in particular surfing (board and kayak). Over these activities are increasing across Scotland.</p>	<p>The PFOW Tourism and Recreation case study and discussion with other stakeholders will identify popular surf breaks and due regard will be given to these features through the implementation of proposed policies for tourism and recreation in future consenting decisions.</p>

Question 10. Are there existing marine activities that you think should be safeguarded now and into the future? For example, commercial fisheries, ferry services and recreational activities.

Response Number*	Response Summary	Working Group Response
	<p>Sea kayaking: Scotland has a reputation as a world class destination for sea kayaking. The Pentland Firth and Orkney waters are some of the most challenging in the UK. Guide books have been written (Scottish Sea Kayaking – Fifty Great Sea Kayaking Voyages; the Northern Isles – Orkney & Shetland Sea Kayaking) and new ones to be published highlight trips to be undertaken by visitors to the area. The some of the areas of the Pentland Firth are very challenging and offer challenges to sea kayakers in the same way as mountaineering on some of the world’s most challenging mountains.</p> <p>Surfing: The areas around Caithness offer some of the best surfing breaks in the world. Major sporting competitions have taken place in the area including a number of world championships for kayak surfing.</p>	<p>AP131: Use the guide book information to inform the PFOW Tourism and Recreation case study.</p> <p>The PFOW Tourism and Recreation case study and discussion with other stakeholders will identify popular surf breaks and due regard will be given to these features through the implementation of the proposed policies for tourism and recreation in future consenting decisions. Data from a number of stakeholders will also be used to inform the Draft Plan.</p>
8 Scottish Water	Yes, Scottish Water strongly believes that existing functional assets and rights to legitimate, licensed activities should be safeguarded	Noted.
9 Caithness Kayak Club	See the details in question 2 on Kayaking. The marine wildlife, fish, shellfish, cetaceans and birds all need their place in the plan.	Noted.
10 Individual	<p>Commercial fisheries are a strong contender for being safeguarded but not saved. This is not to say that they should not evolve with time. Everything changes with time. The experience and knowledge is very important and needs to be passed on.</p> <p>Ferry services are vital. Without them we would see centralisation and the islands they serve would become waste. Air travel cannot take their place. We see this with North Ronaldsay where air travel is fine for the individual but a ferry service is required for the upkeep of the island. This is not to say that we could do without air services. People need to travel for various reasons such as fast medical assistance and communications.</p>	<p>Noted.</p> <p>The importance of safeguarding ferry services to and within Orkney will be addressed in a Safeguarding Ferry Services policy and supporting text in the Draft Plan.</p>

Question 10. Are there existing marine activities that you think should be safeguarded now and into the future? For example, commercial fisheries, ferry services and recreational activities.

Response Number*	Response Summary	Working Group Response
	Recreation forms a large part of our lives. Some people take it on the sea others on the land. On the sea it certainly develops the mind; it shapes your character; you learn to live in close proximity to others yet you also learn independence. It tests you and you learn to live with the elements. Yes it needs to be safeguarded.	Safeguarding existing recreational activities and developing supporting facilities will be addressed in a safeguarding coastal and marine recreation and a recreation, leisure and tourism developments policy in the Draft Plan.
12 Orkney Sustainable Fisheries Ltd.	The commercial fishing industry is a long-standing and established entity in the Orkney Islands and therefore integral to island identity. Fishing provides practical and rewarding autonomous jobs for the traditional working sector of the population. As well as providing more than 370 direct jobs on vessels, the Orkney fishing sector supports many inshore activities too. For example crab processing in Orkney now employs some 120+ people in FTE jobs. These jobs must be safeguarded now and into the future to maintain the viability and cohesiveness of communities in Orkney.	Noted. AP132: The Draft Plan, and particularly the Commercial Fisheries policy or supporting text, will acknowledge the social, cultural and commercial significance of the commercial fishing industry to Orkney, Caithness and Sutherland. AP133: The Commercial Fisheries policy or supporting text will establish broad support for development of facilities and infrastructure that support the sustainable growth of the commercial fisheries sector. AP134: The Sustainable Development policy section will be drafted to ensure the economic benefits of existing economic activity, added value and new development proposals are assessed. Consideration will also be given to developing a policy to assess economic impacts.
13 Royal Yachting Association	Although recreational boating can co-exist with a wide variety of other activities, some protection may well be necessary to safeguard it. The Shipping Study, which builds on the existing RYA UK Coastal Atlas of Recreational Boating, has identified key routes and areas. One key area to be safeguarded would be the inshore route off the west coast of Orkney Mainland. This needs to be adequately wide and well marked.	Noted. AP135: Spatial data for the movement of recreational vessels from the PFOW Shipping Study will be used to support the tourism and recreation sections
14 Orkney Sea	A suitable balance must be achieved between multiple demands on the marine environment and hope that all existing and future marine activities can be	Noted.

Question 10. Are there existing marine activities that you think should be safeguarded now and into the future? For example, commercial fisheries, ferry services and recreational activities.

Response Number*	Response Summary	Working Group Response
Kayak Association	accommodated.	
15 Kirkwall Kayak Club	We appreciate that a suitable balance must be achieved between multiple demands on the marine environment and hope that all existing and future marine activities can be accommodated.	Noted.
16 SportsScotland	We agree that recreational activities should be safeguarded and promoted.	Noted.
17 The Crown Estate	<p>This question is difficult to answer at this point in the planning process as the development of the plan, in liaison with stakeholders, will help to define the overarching vision and objectives, setting the priorities for the plan area and ultimately identifying those activities which should be safeguarded.</p> <p>Given the discrete nature of the physical resources in the plan area (in particular for tidal energy), and the clear policy drivers to support the deployment of commercial scale wave and tidal energy development in Scotland, it is our view that key wave and tidal resource within the plan area should be safeguarded to enable future development of these technologies.</p>	<p>Noted.</p> <p>AP136: Highlight areas for tidal development in the Draft Plan in relation to proposed policy section on marine renewable developments.</p>
19 RSPB	No comments.	N/A
20 Highland Council	Broadly speaking, all existing marine activities should be safeguarded to a degree. The Plan needs to safeguard these as sectoral interests rather than necessarily providing a high degree of protection to every instance of each activity. On some occasions a balance must be struck between competing uses. Some of the existing activities are also subject of future growth potential (e.g. marinas) and such potential should be safeguarded within reason, where it would contribute towards the plan's vision and strategy.	Noted.
21 Scottish Renewables	For the reasons set out above we strongly believe the continued development of marine energy should be safeguarded now and into the future.	Identifying potential areas for marine energy development will be addressed in the Draft Plan.
22 Scottish Wildlife Trust	No comments.	N/A
23 Scottish Power	Question 10, Page 31	The importance of safeguarding ferry services to and within Orkney will be addressed in a Safeguarding Ferry

Question 10. Are there existing marine activities that you think should be safeguarded now and into the future? For example, commercial fisheries, ferry services and recreational activities.

Response Number*	Response Summary	Working Group Response
Renewables	Lifeline ferry services should be safeguarded.	Services policy including lifeline ferry services.
24 Orkney Renewables Energy Forum	Yes, all listed examples should be safeguarded.	Noted.
25 Scottish Salmon Producers Organisation	<p>Yes</p> <p>Existing fish farming sites, sites that have been granted permission and areas suitable for marine salmon farms should be safeguarded and the plan should have policies that achieve this. The plan should have policies that either identify marine areas where salmon farming will be accepted or, if this is not scientifically or technically possible, have a presumption in favour of salmon farming in all areas other than those specifically identified as areas that are constrained in some way.</p> <p>(See also the SSPO representations/objections to the Orkney Islands LDP, the Outer Hebrides LDP, the Highland Wide LDP and the Argyll and Bute LDP).</p> <p>Consideration should be given to developing systems or data that can identify marine areas that are suitable for finfish, especially salmon, farming and protect</p>	<p>Noted.</p> <p>Areas suitable for fish farm development are addressed in the Orkney Aquaculture Supplementary Guidance as this guidance supports the statutory local development plan. In advance of the appropriate governance arrangements to enable the preparation of statutory regional marine plans, it is considered appropriate that LDPs should remain the statutory planning policy framework for aquaculture. It is intended that any future RMP should be the appropriate vehicle for aquaculture planning policy. In Highland, locational policy will remain within the LDP and related guidance until such time that national guidance dictates otherwise. The pilot MSP will not replace existing guidance; rather compliment and support sustainable development of the sector.</p> <p>AP137: The Draft Plan should identify the location of consented fish farms.</p> <p>Noted.</p> <p>Noted. See comment above relating to aquaculture planning policy.</p>

Question 10. Are there existing marine activities that you think should be safeguarded now and into the future? For example, commercial fisheries, ferry services and recreational activities.

Response Number*	Response Summary	Working Group Response
	<p>these areas from other forms of development, i.e. develop a system for the marine area for aquaculture similar to the agricultural land classification system. Highland Council has already accepted this principle by including, in the Adopted Highland Wide Local Development Plan, areas suitable for marine aquaculture, alongside forestry, mineral reserves and prime agricultural land, as being resources worth protecting from other forms of development.</p> <p>(See also the SSPO comments on the Scottish Planning Policy and the National Planning Framework main Issues Report.)</p>	Noted.
26 Orkney Trout Fishing Association	Comments in Question 19 box.	Noted.
27 Colin Kirkpatrick	Comments in Question 19 box.	Noted.
28 Carol Breckenridge	Yes to all of these.	Noted.
29 Highlands and Islands Enterprise	HIE urge MS to safeguard all current existing marine activities both now and in the future.	Noted.
30 Dounreay Site Restoration Ltd.	Comments in Question 19 box.	Noted.
32 Scottish Fishermen's Association	For the SFF, the response to this is the same as for Q8 – The Public Right to fish is on the statute book and this should be safeguarded.	A right (or entitlement) to fish has been developed through common law (or case law) but is not an absolute right and can be subject to statutory restriction. Any development that is likely to have an impact on fishing would require the developer to liaise with fishermen using that area and take their concerns into account. Objections raised would be noted in the

Question 10. Are there existing marine activities that you think should be safeguarded now and into the future? For example, commercial fisheries, ferry services and recreational activities.

Response Number*	Response Summary	Working Group Response
		<p>recommendations to Ministers to inform their determination decision. Fishermen would have the opportunity to raise issues during the consultation process for developments and, if necessary, a liaison group would be set up to help resolve issues between the developers and fishermen. For the renewables industry there is guidance in place to assist this process: the Fishing Liaison with Offshore and Wet Renewables (FLOWW) Best Practice Guidelines.</p>

*Responses number 3 and 31 were in relation to the draft Environmental Report and are not included here. Response number 11 cannot be made public as a Respondent Information Form was not received and number 18 was from an individual that did not give permission to make their response public.

Question 11a. How should the protection and/or enhancement of the natural environment be considered in the marine spatial plan?

Response Number*/ Organisation	Response Summary	Working Group Response
1 Marine Biopolymers	The protection of the natural environment, and note that that may include some developments over time which people might not like but it is nature taking its own course, should be a guiding principle for all. Economic activity can't overrule all considerations but any development with a clear and unacceptable detrimental effect should neither be allowed or encouraged	Noted.
2 Pentland Firth Yacht Club	<p>The termed sustainable is used but without a proper definition is not a real scientific explanation. Every interference by man will impact the environment negatively. Either by actual damage or by upsetting the natural balance. Whilst some species may benefit it will may at the expense of others.</p> <p>Only exploitation that has real benefits to society should be considered. We do not object to investors making profits from such exploitation as long as this is not the solely the motivation for the exploitation.</p> <p>Prior to allowing such investment it is key that the downstream ecological, environmental, archaeological etc. impacts are determined and properly explained; including the integrated impact across the region and between different users. If the scientific evidence is unreliable then staged development with on-going monitoring should be undertaken. Once this has been completed and deemed an acceptable level of damage for the benefit, the socio-economic impact on existing use needs to be reviewed. Where unacceptable compromise is needed by existing users this would also be grounds for rejection.</p> <p>We also recognised that some current users e.g. fishing practices may be doing more damage than some of the proposed new uses. Introduction of new users may require compromises from some users that overall could reduce the amount of damage.</p>	<p>AP138: Provide a clear definition of sustainable development in the Draft Plan.</p> <p>AP139: A Quality of Life / Well Being policy section will be developed in the Draft Plan.</p> <p>AP140: Consider the Scottish Government Survey, Deploy and Monitor Policy Guidance in the development of the Draft Plan. Also consider the Renewable Energy Policy, any potential socio-economic impact policy, policy developed to take account of existing users and the Draft Plan's monitoring framework.</p> <p>Noted.</p>
4 Orkney Fisheries Association	A healthy, functioning marine ecosystem is the foundation upon which many marine industries are based. The pilot plan should ensure that any development in the marine environment does not adversely impact on protected species or habitats or those with a commercial value.	Noted. These issues will be addressed through the development of the proposed commercial fisheries, nature conservation, protected species, biodiversity and geodiversity sections and be informed by the Environmental Report and the Habitats Regulation

Question 11a. How should the protection and/or enhancement of the natural environment be considered in the marine spatial plan?

Response Number*/ Organisation	Response Summary	Working Group Response
		Assessment.
5 Scottish Natural Heritage	<p>Key aspects include:</p> <ul style="list-style-type: none"> • Clear description of the natural environment within the Plan area and identification of the most important elements (e.g. European sites and species, other natural heritage, including landscape, designations, Priority Marine Features etc) and of their sensitivities to various types of development or activity. • Development of robust policies that clearly establish which aspects of the natural environment may constrain development and inform decision making with reference to associated legal requirements (e.g. Habitats Regulations Appraisal). <p>Provision of up to date spatial data (e.g. via a GIS portal) on those aspects of the natural environment that will inform application of the policies and so affect decision making.</p>	<p>AP141: Provide a baseline description of the current state of the marine environment in Plan area at the beginning of the Draft Plan.</p> <p>Noted. The proposed scope of natural heritage related policies, along with the Environmental Report and the Habitats Regulation Assessment, are considered adequate to address statutory requirements and highlight potential constraints / sensitivities.</p> <p>National Marine Plan Interactive will be used to support regional marine planning.</p> <p>AP142: Liaise with SNH to source appropriate natural heritage related data including GIS.</p>
6 Scottish Environment Protection Agency	<p>Any proposals put forward in the Plan should not result in a downgrade in status of any associated water bodies. Not only would this be contrary to the requirements of the Water Framework Directive, but is likely to have negative consequences on other existing and proposed marine (and terrestrial) developments. For example the shellfish sector is reliant on good local water quality.</p> <p>When appraising each development proposal for inclusion in the Plan, consideration should be given to whether it presents an opportunity for any related restoration or enhancement and if so this should also be outlined in the Plan.</p>	<p>Noted. The Water Environment policy(s) will support protection of the status of water bodies.</p> <p>AP143: Consider potential for restoration or enhancement of water quality to be addressed in Water Environment policy(s).</p>
7	No comments.	N/A

Question 11a. How should the protection and/or enhancement of the natural environment be considered in the marine spatial plan?

Response Number*/ Organisation	Response Summary	Working Group Response
Pentland Canoe Club		
8 Scottish Water	Scottish Water considers that high level policies of the relevant bodies should inform this and that the protection of the natural environment should be considered through statutory procedures, using an evidence based approach and regulated consistently across all sectors to ensure that projects are not held up during the planning and construction phase.	Noted.
9 Caithness Kayak Club	The natural environment is a priceless asset which could be destroyed forever, so it must feature prominently in all plans. The strident clamour for “jobs” from many must not obscure the value of the area for fauna and flora. “Soundbites” must not divert attention away from real issues.	Noted.
10 Individual	Throughout the centuries the natural environment has been used for the support of mankind. At time it has been enhanced and is still enhanced again for the support of mankind eg the development of crops. The question is to what degree do we wish to protect or enhance the natural environment. Sand-eels were almost wiped out due to commercial fishing when they were being used for fertiliser. This caused untold damage in the bird population. In another part of this questionnaire you ask about sea weed cultivation. You need to look at every item individually and ask what will happen if we do this. For instance are salmon farms damaging the natural stock and the environment. If they are what do we do about it. This might be a case of if the wild stock is wiped out how do we get them back. Should commercial reasons override environmental ones?	Noted.
12 Orkney Sustainable Fisheries Ltd.	A healthy, functioning marine ecosystem is the foundation upon which many marine industries are based. The pilot plan should ensure that any development in the marine environment does not adversely impact on protected species or habitats or those with a commercial value.	Noted. These issues will be addressed through the development of the proposed commercial fisheries, nature conservation, protected species, biodiversity and geodiversity sections and be informed by the Environmental Report and the Habitats Regulation Assessment.
13 Royal Yachting Association	The plan should be consistent with the current MPA project, in which RYAS has been heavily engaged, and with other existing legislation, e.g. under the Water Framework Directive. Whilst RYAS understands that there may be a case for protection of other, locally important, sites in the future it is our view that any	Noted. The requirements of the Water Framework Directive will be addressed in the Water Environment policy(s) in the Draft Plan.

Question 11a. How should the protection and/or enhancement of the natural environment be considered in the marine spatial plan?

Response Number*/ Organisation	Response Summary	Working Group Response
	proposed designation would need to be based on robust scientific evidence together with a number of baseline principles. The MPA project, for example, was underpinned by a presumption of multiple use.	MPAs, and multiple use, will be addressed in the nature conservation designations policy(s), or supporting text, in the Draft Plan. Guiding Principle 5 (supporting coexistence and enabling multiple use) highlights the importance of supporting coexistence and enabling multiple use of marine space. There is currently no intention to identify additional locally important sites within the marine area i.e. below MLWS. In Orkney a suite of Local Nature Conservation Sites (LNCS) have been identified through a robust assessment process. The LNCS that straddle the intertidal area will be included within the Draft Plan.
14 Orkney Sea Kayak Association	We would like protection of and accessibility to the natural environment to be upheld in the marine spatial plan. Paddlesport is a fantastic way for people to experience the diversity and beauty of the environment.	Noted.
15 Kirkwall Kayak Club	We would like protection of and accessibility to the natural environment to be upheld in the marine spatial plan. Paddlesport is a fantastic way for people to experience the natural diversity and beauty of the PFOW environment. We endeavour to do this in an environmentally sensitive manner and have an Environmental Policy formulated in line with the Scottish Canoe Association advice document "Sea Kayaking – A Guide to Good Environmental Practice" incorporating the Scottish Marine Wildlife Watching Code.	Noted. AP144: We will consider this information when drafting the Draft Plan.
16 SportsScotland	It is important that an evidence based approach is taken. Decisions should not be based indefinitely on a precautionary approach and concerted efforts to remove uncertainty should be made. Assumptions should not be made on impacts and a full understanding of different sectors and their relationship with the natural environment should be developed. In addition it is important to realise that not the entire natural environment is necessarily important and some impacts can be allowed without any particular impact on overall quality. This said a high quality natural environment is integral to enjoyment of it and we	Noted. A large variety of data and research has been gathered to underpin the evidence base for the Draft Plan.

Question 11a. How should the protection and/or enhancement of the natural environment be considered in the marine spatial plan?

Response Number*/ Organisation	Response Summary	Working Group Response
	support the need for positive protection and enhancement of the natural environment.	
17 The Crown Estate	See response to question 13.	Noted.
19 RSPB	The protection and enhancement of the natural environment should be integral facets of the marine spatial plan. Consideration should be made in the context of achieving good environmental status of the marine environment as per the aims of the MSFD. To achieve this, the ecosystem-based approach should be applied.	Noted. Guiding Principle 2 (Ecosystem Approach) highlights the importance of MSFD/the ecosystems approach in underpinning the marine spatial plan. OTFA AP145: An updated schematic will show how the Draft Plan fits within other documents and policies.
20 Highland Council	Many of the features of the natural environment are subject of specific statutory requirements for the consideration of any impacts of development proposals upon them. Terrestrial plans (e.g. LDPs) contain policies which reflect these requirements and it would be appropriate if consideration in the marine spatial plan were consistent with these.	Noted. The statutory requirements addressed in the adjoining LDPs have informed the policy issues identified in the Planning Issues and Options Paper. These will be addressed in detail within the Draft Plan.
21 Scottish Renewables	Spatial information regarding existing protected areas and proposed MPAs should be contained in the plan. Any policies contained within the plan in relation to protected areas must be consistent with the legislative requirements of the particular designations and the plan's proposed policy to facilitate the sustainable development of the marine renewable energy sector. In particular the plan should be clear that designated areas, including Natura sites, do not necessarily mean 'no-go' areas for renewable energy development. All developments which may impact on protected sites must already meet the legislative requirements laid down in the relevant legislation before they can proceed. The marine spatial plan also supports the 'wider seas' pillar of the Scottish Government's marine nature conservation strategy and to this end, the sectoral plans already take account of environmental sensitivities to ensure developments proceed in the most appropriate locations.	Noted. A146: The Draft Plan should explain that designated nature conservation sites are not 'no-go' areas for development. Noted.

Question 11a. How should the protection and/or enhancement of the natural environment be considered in the marine spatial plan?

Response Number*/ Organisation	Response Summary	Working Group Response
	<p>A healthy marine environment underpins all the socio-economic benefits that we enjoy from our seas, including eco-system services such as climate regulation. As recognised by the Marine Atlas, climate change is one of the most pervasive threats to the health of the marine environment. The development of renewable energy, including offshore renewables, to support the decarbonisation of the electricity system is therefore key to any strategy aimed at the protection and/or enhancement of the natural environment and the plan should reflect this.</p>	<p>AP147: Climate change will be a policy area within the Draft Plan.</p>
<p>22 Scottish Wildlife Trust</p>	<p>Scottish Minister's have a duty, when undertaking statutory marine planning in Scottish waters under the Marine (Scotland) Act, to further the achievement of sustainable development, including the protection and, where appropriate, enhancement of the health of that area. Utilising an ecosystems-based approach as per the MSFD the plan should be aimed at achieving and/or maintaining GES. As above the plan should further aim to achieve ecological objectives that maintain or restore (a) native species diversity, (b) habitat diversity and heterogeneity, (c) populations of keystone species and (d) connectivity.</p>	<p>AP148: Consider these stated objectives when defining and delivering the ecosystems approach in the Draft Plan.</p>
<p>23 Scottish Power Renewables</p>	<p>Question 11a, Page 31</p> <p>This is likely to be covered in other European legislation and the formation of the coherent network of MPAs in Scottish Waters. Therefore, reference should be made within the plan to these programmes.</p>	<p>Noted.</p>
<p>24 Orkney Renewables Energy Forum</p>	<p>As a priority but without subjectivity being allowed to take precedence. Objections to development from a natural environment perspective must be based on fact. It is not enough to simply infer that as there might be an impact that it is automatically justified that a development must be prevented from proceeding. Evidence must be provided from both sides of the 'fence' to ensure that undue costs and delay are not allowed to proliferate as a result of an assertion of any unevicenced potential impact on the natural environment.</p>	<p>Noted.</p>
<p>25 Scottish Salmon</p>	<p>Consideration of the marine environment should be given the same weight as economic and social considerations.</p>	<p>AP149: The Sustainable Development policy section will be drafted to ensure the economic benefits of existing economic activity, added value and new development</p>

Question 11a. How should the protection and/or enhancement of the natural environment be considered in the marine spatial plan?

Response Number*/ Organisation	Response Summary	Working Group Response
Producers Organisation		proposals are assessed. Consideration will also be given to developing a policy to assess economic impacts.
26 Orkney Trout Fishing Association	Comments in Question 19 box.	Noted.
27 Colin Kirkpatrick	Comments in Question 19 box.	Noted.
28 Carol Breckenridge	Preserve and do not interfere with the wildness which has recovered after 2 World Wars.	Landscape and seascape issues will be addressed in the landscape and seascape policy in Draft Plan.
29 Highlands and Islands Enterprise	HIE believe a robust marine environment is the foundation for all the socio-economic benefits derived from the sea. It is imperative spatial information regarding existing protected areas and proposed Marine Planning Areas should be included in the plan.	Noted.
30 Dounreay Site Restoration Ltd.	Comments in Question 19 box.	Noted.
32 Scottish Fishermen's Association	The MSP should feature an integrated approach to economic use of the area which addresses protection of the Natural Environment. The SFF would agree that protection of the natural environment is important but would also stress the need to take into account the effects of any measures in the plan on the socio-economic structures of peripheral communities. [Comment in relation to 11b]	AP150: The Sustainable Development policy section will be drafted to ensure the economic benefits of existing economic activity, added value and new development proposals are assessed. Consideration will also be given to developing a policy to assess economic impacts. Noted.

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Question 11b. Is the protection of the natural environment important? How important is it?

Response Number*	Response Summary					Working Group Response
	Please indicate on a scale of 1 – 5 (1 = Not important at all, 5 = The highest importance)					
	1	2	3	4	5	
1 Marine Biopolymers				X		Refer to Figure 2.4 in the PFOW MSP Consultation Analysis report to view the overall response to Question 11b. The response will be analysed and will inform the preparation of the Draft Plan vision and strategic objectives.
2 Pentland Firth Yacht Club					X	Refer to Figure 2.4 in the PFOW MSP Consultation Analysis report to view the overall response to Question 11b. The response will be analysed and will inform the preparation of the Draft Plan vision and strategic objectives.
4 Orkney Fisheries Association				X		Refer to Figure 2.4 in the PFOW MSP Consultation Analysis report to view the overall response to Question 11b. The response will be analysed and will inform the preparation of the Draft Plan vision and strategic objectives.
5 Scottish Natural Heritage					X	Refer to Figure 2.4 in the PFOW MSP Consultation Analysis report to view the overall response to Question 11b. The response will be analysed and will inform the preparation of the Draft Plan vision and strategic objectives.
6 Scottish Environment Protection Agency					X	Refer to Figure 2.4 in the PFOW MSP Consultation Analysis report to view the overall response to Question 11b. The response will be analysed and will inform the preparation of the Draft Plan vision and strategic objectives.
7 Pentland Canoe Club				X		Refer to Figure 2.4 in the PFOW MSP Consultation Analysis report to view the overall response to Question 11b. The response will be analysed and will inform the preparation of the Draft Plan vision and strategic objectives.

Question 11b. Is the protection of the natural environment important? How important is it?

8 Scottish Water						Noted.
9 Caithness Kayak Club					X	Refer to Figure 2.4 in the PFOW MSP Consultation Analysis report to view the overall response to Question 11b. The response will be analysed and will inform the preparation of the Draft Plan vision and strategic objectives.
10 Individual				X		Refer to Figure 2.4 in the PFOW MSP Consultation Analysis report to view the overall response to Question 11b. The response will be analysed and will inform the preparation of the Draft Plan vision and strategic objectives.
12 Orkney Sustainable Fisheries Ltd.				X		Refer to Figure 2.4 in the PFOW MSP Consultation Analysis report to view the overall response to Question 11b. The response will be analysed and will inform the preparation of the Draft Plan vision and strategic objectives.
13 Royal Yachting Association				X		Refer to Figure 2.4 in the PFOW MSP Consultation Analysis report to view the overall response to Question 11b. The response will be analysed and will inform the preparation of the Draft Plan vision and strategic objectives.
14 Orkney Sea Kayak Association				X		Refer to Figure 2.4 in the PFOW MSP Consultation Analysis report to view the overall response to Question 11b. The response will be analysed and will inform the preparation of the Draft Plan vision and strategic objectives.
15 Kirkwall Kayak Club				X		Refer to Figure 2.4 in the PFOW MSP Consultation Analysis report to view the overall response to Question 11b. The response will be analysed and will inform the preparation of the Draft Plan vision and strategic objectives.
16 SportsScotland						N/A
17						N/A

Question 11b. Is the protection of the natural environment important? How important is it?

The Crown Estate						
19 RSPB					X	Refer to Figure 2.4 in the PFOW MSP Consultation Analysis report to view the overall response to Question 11b. The response will be analysed and will inform the preparation of the Draft Plan vision and strategic objectives.
20 Highland Council					X	Refer to Figure 2.4 in the PFOW MSP Consultation Analysis report to view the overall response to Question 11b. The response will be analysed and will inform the preparation of the Draft Plan vision and strategic objectives.
21 Scottish Renewables				X		Refer to Figure 2.4 in the PFOW MSP Consultation Analysis report to view the overall response to Question 11b. The response will be analysed and will inform the preparation of the Draft Plan vision and strategic objectives.
22 Scottish Wildlife Trust					X	Refer to Figure 2.4 in the PFOW MSP Consultation Analysis report to view the overall response to Question 11b. The response will be analysed and will inform the preparation of the Draft Plan vision and strategic objectives.
23 Scottish Power Renewables						Noted. The Scottish Power Renewables response was “Very important and will be covered by European and domestic legislation and protection as set out in other documentation”.
24 Orkney Renewables Energy Forum			X			Refer to Figure 2.4 in the PFOW MSP Consultation Analysis report to view the overall response to Question 11b. The response will be analysed and will inform the preparation of the Draft Plan vision and strategic objectives.
25 Scottish Salmon			X			Refer to Figure 2.4 in the PFOW MSP Consultation Analysis report to view the overall response to Question 11b. The response will be analysed and will inform the

Question 11b

Question 11b. Is the protection of the natural environment important? How important is it?

Producers Organisation						preparation of the Draft Plan vision and strategic objectives.
26 Orkney Trout Fishing Association						Refer to Figure 2.4 in the PFOW MSP Consultation Analysis report to view the overall response to Question 11b. The response will be analysed and will inform the preparation of the Draft Plan vision and strategic objectives.
27 Colin Kirkpatrick						N/A
28 Carol Breckenridge					X	Refer to Figure 2.4 in the PFOW MSP Consultation Analysis report to view the overall response to Question 11b. The response will be analysed and will inform the preparation of the Draft Plan vision and strategic objectives.
29 Highlands and Islands Enterprise					X	Refer to Figure 2.4 in the PFOW MSP Consultation Analysis report to view the overall response to Question 11b. The response will be analysed and will inform the preparation of the Draft Plan vision and strategic objectives.
30 Dounreay Site Restoration Ltd.						N/A
32 Scottish Fishermen's Association			X			Refer to Figure 2.4 in the PFOW MSP Consultation Analysis report to view the overall response to Question 11b. The response will be analysed and will inform the preparation of the Draft Plan vision and strategic objectives.

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Question 12a. How should the protection and/or enhancement of historic and culture resources (e.g. Scapa Flow wrecks) be considered in the marine spatial plan?

Response Number*	Response Summary	Working Group Response
1 Marine Biopolymers	I am no expert in this area but they should all be given due consideration in the plan and in the context of any future developments	Noted.
2 Pentland Firth Yacht Club	Consistent with our previous comments we believe that such assets should remain protected irrespective of the benefits to new uses. However this does not mean that access to or exploitation of these assets by existing users should not be subject to compromise to allow additional beneficial uses of the region.	Noted.
4 Orkney Fisheries Association	The sea is a corrosive and at times violent environment and therefore protection in a terrestrial sense can only be very limited.	Noted.
5 Scottish Natural Heritage	We have no comments to offer on this aspect	Noted.
6 Scottish Environment Protection Agency	While we appreciate this is an important issue it is not directly within our remit so we have not provided comment.	Noted.
7 Pentland Canoe Club	No comments.	N/A
8 Scottish Water	Scottish Water has no comment	Noted.
9 Caithness Kayak Club	This a very valid aspect and must be kept in view. Applies equally well to features in Caithness. Once damaged or destroyed we cannot restore our heritage.	Noted.
10 Individual	The Scapa Flow wrecks are corroding away. In themselves they are probably of very little historic value unlike their story. As wrecks their only value is attraction for the tourist industry, marine growth and fish until they disappear. Any item of importance should be removed and placed on show in the Lyness museum.	Noted.

Question 12a

Question 12a. How should the protection and/or enhancement of historic and culture resources (e.g. Scapa Flow wrecks) be considered in the marine spatial plan?

Response Number*	Response Summary	Working Group Response
	<p>They are at present only of commercial value and hence should come under the control of OIC. It is this commercial side that needs to be looked at with the possibility of sinking other ships to keep this diving side of tourism functioning.</p> <p>War graves are classed completely different. You cannot say that they should be preserved as this is not possible but they should be permanently marked.</p> <p>With other wrecks one needs to determine whether it is the wreck itself that is of value or is it the story and then make a decision on this. It should also be remembered that a wreck in a safe haven cannot be used to prevent anchoring if the needs are their. The protection of the historic and cultural environment is in the written documentation and film if possible.</p>	<p>Noted. In relation to war graves, All military aircraft are automatically designated as Protected Places under the Protection of Military Remains Act 1986 (Designation of vessels and controlled sites) Order 2012. Vessels may be designated under this Act either as a Protected Place or as a Controlled Site. Divers may visit a Protected Place on a "look but don't touch" basis. Divers are prohibited from visiting Controlled Sites without a license. This Act is administered by the UK Ministry of Defense (RAF for aircraft, Navy for vessels). Data on Historic MPAs and other wrecks will also be considered as appropriate.</p> <p>AP151: The comments will be taken into consideration when drafting the Plan.</p>
12 Orkney Sustainable Fisheries Ltd.	The sea is a corrosive and at times violent environment and therefore protection in a terrestrial sense can only be very limited.	Noted.
13 Royal Yachting Association	<p>This should build on the protection given to Historic MPAs.</p> <p>Protection for other sites needs to be considered on a case by case basis to minimise adverse effects on other legitimate uses of the waters.</p>	<p>Noted.</p> <p>Noted.</p>
14 Orkney Sea Kayak Association	We would like protection of and accessibility to historic and cultural sites to be upheld in the marine spatial plan. Paddlesport is a great way to visit and explore a wide variety of cultural and historic sites, including more remote attractions such as lighthouses, brochs, Martello towers and wartime sites.	Noted.
15	We would like protection of and accessibility to historic and cultural sites to be	Noted.

Question 12a

Question 12a. How should the protection and/or enhancement of historic and culture resources (e.g. Scapa Flow wrecks) be considered in the marine spatial plan?

Response Number*	Response Summary	Working Group Response
Kirkwall Kayak Club	upheld in the marine spatial plan. Paddlesport is a great way to visit and explore a wide variety of cultural and historic sites, including more remote attractions such as lighthouses, brochs, Martello towers and wartime sites.	
16 SportsScotland	<p>See answer to 11a. Scapa flow wrecks are internationally important for sport diving and recognition of this particular importance should be recognised in policy.</p> <p>It would be useful to clarify what is included as part of culture. It could be argued that sport and recreation forms an integral component of the culture of the area and that as such will be included in the protection of cultural resources. We are not necessarily arguing for this (although there could be advantages to the recreational sector) but clarity is needed on what comprises a cultural resource.</p>	<p>AP152: The safeguarding coastal and marine recreation policy in the Draft Plan, or supporting text, should acknowledge the international importance of the Scapa Flow wrecks for sport and recreational diving.</p> <p>AP153: A historic environment policy will be developed in the Draft Plan as opposed to a cultural and historic environment policy. Cultural considerations are to a great extent covered under other specific policies e.g. recreation, landscape seascape, commercial fisheries.</p> <p>AP154: A Quality of Life / Well Being policy section will be developed in the Draft Plan to take account of these issues.</p>
17 The Crown Estate	See response to question 13.	Noted.
19 RSPB	No comments.	N/A
20 Highland Council	Many of the historic and culture resources are subject of specific statutory requirements for the consideration of any impacts of development proposals upon them. Terrestrial plans (e.g. LDPs) contain policies which reflect these requirements and it would be appropriate if consideration in the marine spatial plan were consistent with these.	Noted. The statutory requirements addressed in the adjoining LDPs have informed the policy issues identified in the Planning Issues and Options Paper. These will be addressed in detail within the Draft Plan, including policies on integrating marine and coastal development, historic environment and culture.
21 Scottish Renewables	Spatial information relating to historic protected areas or other designations relating the historic and cultural resources should be included in the plan. Any restrictions imposed by these designations should also be referenced. A guide to dealing with historic and cultural resources in relation to marine energy	<p>Noted.</p> <p>AP156: Review the Historic Scotland guide to dealing with historic and cultural resources in relation to marine</p>

Question 12a

Question 12a. How should the protection and/or enhancement of historic and culture resources (e.g. Scapa Flow wrecks) be considered in the marine spatial plan?

Response Number*	Response Summary	Working Group Response
	<p>developments is being prepared for Historic Scotland. This guide should be referenced.</p> <p>Energy developments strive to undertake projects in a manner which is compatible with the appropriate preservation of the historic and cultural environment.</p>	<p>energy developments to inform the preparation of the historic environment policy.</p> <p>Noted.</p>
22 Scottish Wildlife Trust	No comments.	N/A
23 Scottish Power Renewables	<p>Question 12a, Page 31</p> <p>These are already covered by current and future legislation. Reference should be made by the Draft Plan to these where appropriate.</p>	Noted.
24 Orkney Renewables Energy Forum	The exploitation of renewable marine energy resources is a continuation of mankind's historic relationship with the waters of Orkney and the Pentland Firth.	
25 Scottish Salmon Producers Organisation	In a balanced way.	Noted.
26 Orkney Trout Fishing Association	Comments in Question 19 box.	Noted.
27 Colin Kirkpatrick	Comments in Question 19 box.	Noted.
28 Carol Breckenridge	Stroma should be preserved – as iconic as St.Kilda.	Stroma has one listed building and four Scheduled Monuments. It has existing statutory protection for particular historic assets which will be addressed under the historic environment policy. There is no existing

Question 12a. How should the protection and/or enhancement of historic and culture resources (e.g. Scapa Flow wrecks) be considered in the marine spatial plan?

Response Number*	Response Summary	Working Group Response
		Conservation Area for Stroma.
29 Highlands and Islands Enterprise	HIE believe the protection and/or enhancement of historic and culture resources should be included in the plan. It is important that as energy develops the historic and cultural environment around it should be preserved and adhered to as much as possible.	Noted.
30 Dounreay Site Restoration Ltd.	Comments in Question 19 box.	Noted.
32 Scottish Fishermen's Association	The MSP should take note of all previous designations of historical significance, which in general will also now be translated into designation under the Marine (Scotland) 2010 Act. This protection is important and should receive its due place in the process. [Comment in relation to 12b]	Noted. Noted.

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Question 12b. Is the protection of the historic and cultural environment important? How important is it?

Response Number*	Response Summary					Working Group Response
	Please indicate on a scale of 1 – 5 (1 = Not important at all, 5 = The highest importance)					
	1	2	3	4	5	
1 Marine Biopolymers			X			Refer to Figure 2.5 in the PFOW MSP Consultation Analysis report to view the overall response to Question 12b. The response will be analysed and will inform the preparation of the Draft Plan vision and strategic objectives.
2 Pentland Firth Yacht Club					X	Refer to Figure 2.5 in the PFOW MSP Consultation Analysis report to view the overall response to Question 12b. The response will be analysed and will inform the preparation of the Draft Plan vision and strategic objectives.
4 Orkney Fisheries Association				X		Refer to Figure 2.5 in the PFOW MSP Consultation Analysis report to view the overall response to Question 12b. The response will be analysed and will inform the preparation of the Draft Plan vision and strategic objectives.
5 Scottish Natural Heritage						N/A
6 Scottish Environment Protection Agency						N/A
7 Pentland Canoe Club				X		Refer to Figure 2.5 in the PFOW MSP Consultation Analysis report to view the overall response to Question 12b. The response will be analysed and will inform the preparation of the Draft Plan vision and strategic objectives.

Question 12b. Is the protection of the historic and cultural environment important? How important is it?

8 Scottish Water						N/A
9 Caithness Kayak Club					X	Refer to Figure 2.5 in the PFOW MSP Consultation Analysis report to view the overall response to Question 12b. The response will be analysed and will inform the preparation of the Draft Plan vision and strategic objectives.
10 Individual			X			Refer to Figure 2.5 in the PFOW MSP Consultation Analysis report to view the overall response to Question 12b. The response will be analysed and will inform the preparation of the Draft Plan vision and strategic objectives.
12 Orkney Sustainable Fisheries Ltd.				X		Refer to Figure 2.5 in the PFOW MSP Consultation Analysis report to view the overall response to Question 12b. The response will be analysed and will inform the preparation of the Draft Plan vision and strategic objectives.
13 Royal Yachting Association				X		Refer to Figure 2.5 in the PFOW MSP Consultation Analysis report to view the overall response to Question 12b. The response will be analysed and will inform the preparation of the Draft Plan vision and strategic objectives.
14 Orkney Sea Kayak Association				X		Refer to Figure 2.5 in the PFOW MSP Consultation Analysis report to view the overall response to Question 12b. The response will be analysed and will inform the preparation of the Draft Plan vision and strategic objectives.
15 Kirkwall Kayak Club				X		Refer to Figure 2.5 in the PFOW MSP Consultation Analysis report to view the overall response to Question 12b. The response will be analysed and will inform the preparation of the Draft Plan vision and strategic objectives.
16 SportsScotland						N/A

Question 12b

Question 12b. Is the protection of the historic and cultural environment important? How important is it?

17 The Crown Estate						Refer to Figure 2.5 in the PFOW MSP Consultation Analysis report to view the overall response to Question 12b. The response will be analysed and will inform the preparation of the Draft Plan vision and strategic objectives.
19 RSPB						N/A
20 Highland Council					X	Refer to Figure 2.5 in the PFOW MSP Consultation Analysis report to view the overall response to Question 12b. The response will be analysed and will inform the preparation of the Draft Plan vision and strategic objectives.
21 Scottish Renewables				X		Refer to Figure 2.5 in the PFOW MSP Consultation Analysis report to view the overall response to Question 12b. The response will be analysed and will inform the preparation of the Draft Plan vision and strategic objectives.
22 Scottish Wildlife Trust						N/A
23 Scottish Power Renewables						Noted. Scottish Power Renewables response was “Very important.”
24 Orkney Renewables Energy Forum			X			Refer to Figure 2.5 in the PFOW MSP Consultation Analysis report to view the overall response to Question 12b. The response will be analysed and will inform the preparation of the Draft Plan vision and strategic objectives.
25 Scottish Salmon Producers Organisation						N/A

Question 12b. Is the protection of the historic and cultural environment important? How important is it?

26 Orkney Trout Fishing Association			X			Noted.
27 Colin Kirkpatrick						Noted.
28 Carol Breckenridge					X	Refer to Figure 2.5 in the PFOW MSP Consultation Analysis report to view the overall response to Question 12b. The response will be analysed and will inform the preparation of the Draft Plan vision and strategic objectives.
29 Highlands and Islands Enterprise				X		Refer to Figure 2.5 in the PFOW MSP Consultation Analysis report to view the overall response to Question 12b. The response will be analysed and will inform the preparation of the Draft Plan vision and strategic objectives.
30 Dounreay Site Restoration Ltd.						N/A
32 Scottish Fishermen's Association			X			Refer to Figure 2.5 in the PFOW MSP Consultation Analysis report to view the overall response to Question 12b. The response will be analysed and will inform the preparation of the Draft Plan vision and strategic objectives.

*Responses number 3 and 31 were in relation to the draft Environmental Report and are not included here. Response number 11 cannot be made public as a Respondent Information Form was not received and number 18 was from an individual that did not give permission to make their response public.

Question 13a. How should the promotion and support of economic growth be considered in the marine spatial plan? If any, which economic activities would you like to see grow and develop?

Response Number*	Response Summary	Working Group Response
<p>1 Marine Biopolymers</p>	<p>It needs to be a key element of the plan in that responsible economic development will underpin the future economic success and stability of the region. Economic development, in the Orkney/Pentland context, could mean various things, and tourism could be considered as relevant and important as new industries. New businesses which intend to develop in the context or framework of the plan and its key principles (respect for the environment, sustainability etc) need to be supported and encouraged, especially those which create highest added value for the community</p> <p>I have a frequently articulated view on development which centres on the need to add value locally, especially through new and high value manufacturing activities which will have a long term future.</p> <p>I would like to see the “seaweed industry” in its broadest sense included in the scope of the (economic) activities within the scope of the plan, whether existing or potential for the future (the seaweed will always be there) – our goal would be to see an integrated renaissance of the region’s seaweed industry, with relevant outputs such as seaweed for foods or seaweed components produced locally. There is the potential to create a local seaweed industry of the scale of £50 m pa in business revenue terms, and this would be a sustainable and valuable contribution to the region’s economic future</p>	<p>Noted.</p> <p>AP157: The Sustainable Development policy section will be drafted to ensure the economic benefits of existing economic activity, added value and new development proposals are assessed. Consideration will also be given to developing a policy to assess economic impacts.</p> <p>AP158: Seaweed will be considered under the aquaculture sector of the Draft Plan.</p>
<p>2 Pentland Firth Yacht Club</p>	<p>The PFYC has no preferences for any particular type of exploitation as long as consistent with our comments previously – beneficial, acceptable level of damage, fits with existing users. For some types of development this is easier to achieve than others. For example seabed tidal turbines will likely have less impact than surface mounted wave generators.</p>	<p>Noted.</p>
<p>4 Orkney Fisheries Association</p>	<p>Economic growth requires removing the burdens from businesses and individuals to be able to prosper. For fisheries, increased development in the marine environment could potentially cause displacement of fishing effort and/or exclusion from important fishery grounds. Combined with increasing fuel prices and volatile market prices for catches, the prospects for innovation and growth in this sector are not looking good. There needs to be a clearer understanding of</p>	<p>AP159: There is current research on a number of fisheries related projects including e.g. ScotMap, the effect of displacement; vessel tracking and these data will be used to inform the Draft Plan.</p>

Question 13a. How should the promotion and support of economic growth be considered in the marine spatial plan? If any, which economic activities would you like to see grow and develop?

Response Number*	Response Summary	Working Group Response
	<p>how the fishery operates in Orkney as well as the social context in which it is embedded. For example, despite their not making a significant economic return, many fishermen continue to fish because it represents a family tradition or because they enjoy the level of autonomy they have over their job. We recommend making the fishing industry in Orkney a local strategic priority and propose that all future growth in the marine environment is located, designed and managed in a way that does not adversely impact on it.</p> <p>It is also relevant to note that GDP is now no longer the sole indicator of a country's economic success and the Office for National Statistics now rates 'wellbeing' as a significant national policy goal.</p>	<p>AP160: In developing the Draft Plan strategies the objectives will take into account existing economic activity including fisheries.</p> <p>AP161: A Quality of Life / Well Being policy section will be developed in the Draft Plan.</p>
5 Scottish Natural Heritage	We consider that a central purpose for marine planning, in support of sustainable economic development is to provide clarity at a strategic level with respect to key constraints, and opportunities to enable robust decision making by both developers and regulators at project level. Please also refer to our answer to question 11a.	Noted.
6 Scottish Environment Protection Agency	While we appreciate this is an important issue it is not directly within our remit so we have not provided comment.	Noted.
7 Pentland Canoe Club	<p>Economic Activities which should be encouraged to grow in the area are:</p> <ul style="list-style-type: none"> • Adventure Tourism: The Spatial plan could assist this aspiration to develop. • Use of Natural Products • Operational & Maintenance Support based out of key ports and harbours (Scrabster, Gills in Caithness) 	<p>AP162: Consider existing adventure tourism activities within the PFOW tourism and recreation case study. Support the growth of adventure tourism in the Draft Plan tourism and recreation policies.</p> <p>Noted. It is unclear what the 'use of natural products' is referring to specifically.</p> <p>The port and harbour development and infrastructure policy in the Draft Plan will support the development of port and harbour infrastructure for marine renewable</p>

Question 13a

Question 13a. How should the promotion and support of economic growth be considered in the marine spatial plan? If any, which economic activities would you like to see grow and develop?

Response Number*	Response Summary	Working Group Response
		<p>energy operations and maintenance.</p> <p>Land based facilities and appropriate land use allocation at ports and harbours are within the remit of local development plans and associated development briefs.</p> <p>AP163: The Working Group will work to co-ordinate onshore and offshore planning policies.</p>
8 Scottish Water	Scottish Water believes that these issues should be set in the context of the overall sustainable development of Scotland and must take socio-economic aspects into account at the policy development stage.	Noted.
9 Caithness Kayak Club	The scale of development is critical. If we go for a “boom town” approach we will lose an awful lot. If we go for a measured approach then the existing infrastructure will readily absorb these new developments and new workers, but the focus should be on training existing young and not so young people in the counties.	Noted.
10 Individual	<p>Marine renewables are not looking too healthy. Aquamarine results show them to be heavily in debt and it would not be surprising to see others in the same position. With very little income and large outgoings in development this is not surprising. To get out of this predicament the modification of the infrastructure needs to be running ahead of renewables development. OIC are doing a considerable amount with the providing of port facilities but outside of Orkney everything seems to be getting bogged down.</p> <p>This also includes connection and transmission charges. At present the authorities are playing round the edges and will be most unlikely to come up with a satisfactory conclusion. The bullet needs to be bitten and a complete new formula written. Whether you are in the SE of England, the Central Valley of Scotland, the Scottish Islands or Lands End the charges should be identical, not per unit nor per mile but the actual figure. This might also have benefits with equalising the spread of people throughout the UK. Unless all this is done stagnation will take place and the population will start to ask government why they are having such a large increase in their bills and seeing no results. How</p>	<p>Noted.</p> <p>Noted. The importance of developing grid infrastructure will be acknowledged in the electricity and telecommunications infrastructure section of the Draft Plan.</p>

Question 13a. How should the promotion and support of economic growth be considered in the marine spatial plan? If any, which economic activities would you like to see grow and develop?

Response Number*	Response Summary	Working Group Response
	<p>you could write this into a Marine Spatial Plan might be difficult but hasn't this all been raised because of renewables. To get things moving on a permanent long term basis the developers need to know that the infrastructure is going to be there in time, of sufficient scale and at the right price.</p> <p>The greatest possibilities may be with marine tourism. Orkney, Shetland and the Norwegian Coast are just waiting to be opened up the same as France has been for many years. Many of the yachtsmen in the south of England and the Clyde must be longing to get to new and completely different venues. However to bring a boat up from these areas takes just too long especially if you have to take it back again. Studies will need to be made concerning the potential market, the supply of hard standing preferably under cover, availability of maintenance with the necessary skills, sales literature etc.</p> <p>Aquaculture as regards finfish should be limited to areas where there is sufficient flow of water to prevent damage to the sea bed and is not in direct opposition to other users. This will generally mean onshore cultivation where there should be no pollution of the local waters, no opposition to other users of the sea, no need for expensive work boats, no damage to wild fish and a reduction in marine litter.</p> <p>Aquaculture as regards shellfish needs a lot more investigation. One of the biggest problems is with amnesic shellfish poisoning (ASP). There needs to be a major study into this and from this can it be prevented or how can you mitigate against it.</p> <p>Sail training, as has already been mentioned, provides great opportunities for the development of personal character in its ability to work with others, to command, to make correct judgements and frequently all done under stress.</p>	<p>AP164: Consider these issues in tourism and recreation PFOW case study and policies in the Draft Plan.</p> <p>Spatial guidance for aquaculture development is addressed in the Orkney Aquaculture Supplementary Guidance. In Highland, locational policy will remain within the LDP and related guidance until such time that national guidance dictates otherwise. The pilot MSP will not replace existing guidance; rather compliment and support sustainable development of the sector. There is a presumption against finfish development on the north coast of Scotland as set out in Scottish Planning Policy.</p> <p>Noted. Procedures are in place between local authorities and the Food Standards Agency to monitor toxic phytoplankton and take any necessary action.</p> <p>Noted.</p>

Question 13a

Question 13a. How should the promotion and support of economic growth be considered in the marine spatial plan? If any, which economic activities would you like to see grow and develop?

Response Number*	Response Summary	Working Group Response
	<p>There is a need for this form of training to be set up in Orkney to work in conjunction with schools and youth clubs. It may be possible for the cost of this to be partially offset by using the vessels for bonding exercises with the various companies in renewables etc.</p> <p>It should be seen that Marine Scotland through the spatial plan is supplying the opportunities for not only protecting the environment but that the plan is able to create the social environment for producing work and opportunities for the population.</p>	<p>Noted. This will be supported by the guiding principles of the plan.</p>
12 Orkney Sustainable Fisheries Ltd.	<p>The plan should recognise the importance of devolved fisheries management and the extent to which existing traditional industries are dependent on the entire area (see Section 5 comment above regarding larvae distribution). The plan should consider how the deployment of marine energy devices may impact on inshore fishing, and support the notion of co-operation between different industrial sectors</p>	<p>AP165: Liaise further with local fisheries stakeholders to consider how devolved fisheries management in PFOW can be addressed in the Draft Plan.</p>
13 Royal Yachting Association	<p>It is sustainable economic growth that needs to be promoted and supported. Economic growth that has adverse effects on other sectors could have a deleterious effect on the local economy as a whole. Policy 21, tourism and recreation, captures this aspect. There is scope for an increase in the recreational boating sector particularly small scale developments in Sutherland and to the less developed parts of Orkney.</p>	<p>Noted. The tourism and recreation policies will address these issues, along with the sustainable development sections.</p> <p>AP166: The Sustainable Development policy section will be drafted to ensure the economic benefits of existing economic activity, added value and new development proposals are assessed. Consideration will also be given to developing a policy to assess economic impacts.</p>
14 Orkney Sea Kayak Association	<p>We would like promotion and support of economic growth to be upheld in the marine spatial plan. As a paddlesport group with awareness of increasing interest in paddlesport tourism in Orkney, we can potentially foresee the formation of professional paddlesport guiding companies in the area.</p>	<p>Noted. The tourism and recreation policies will address these issues.</p> <p>AP167: The Sustainable Development policy section will be drafted to ensure the economic benefits of existing economic activity, added value and new development proposals are assessed. Consideration will also be given to developing a policy to assess economic impacts.</p>

Question 13a. How should the promotion and support of economic growth be considered in the marine spatial plan? If any, which economic activities would you like to see grow and develop?

Response Number*	Response Summary	Working Group Response
15 Kirkwall Kayak Club	We would like promotion and support of economic growth to be upheld in the marine spatial plan. As a paddlesport group with a growing membership, and awareness of an increasing interest in paddlesport tourism to PFOW, we can potentially foresee the formation of professional paddlesport guiding companies in the area.	Noted. The tourism and recreation policies will address these issues, along with the sustainable development sections. AP168: The Sustainable Development policy section will be drafted to ensure the economic benefits of existing economic activity, added value and new development proposals are assessed. Consideration will also be given to developing a policy to assess economic impacts.
16 SportsScotland	Sustainably. Policy should make clear that economic development shouldn't be allowed at all costs but should be promoted in a sustainable way that doesn't destroy the particular qualities of the area. In relation to recreation there is a need to recognise that for some forms of development there will be a particular locations need – e.g. changing facilities next to the resource used. Policy should provide for such locational requirements.	Noted. The tourism and recreation policies will address these issues, along with the sustainable development sections. AP169: The Sustainable Development policy section will be drafted to ensure the economic benefits of existing economic activity, added value and new development proposals are assessed. Consideration will also be given to developing a policy to assess economic impacts. AP170: Prepare tourism and recreation policies in partnership with adjoining planning authorities to ensure a coordinated policy approach with coastal recreational land use policies.
17 The Crown Estate	In response to questions 11, 12 and 13, we consider that it is difficult to prioritise these receptors at this stage in the planning process as the development of the plan, in liaison with stakeholders, will help to define the overarching vision and objectives, setting the priorities for the plan area and ultimately identifying those activities which should be safeguarded or prioritised. The plan should aim to establish how the protection and enhancement of natural environment, historic and culture resources can be balanced with ambitions for sustainable economic development.	Noted.

Question 13a

Question 13a. How should the promotion and support of economic growth be considered in the marine spatial plan? If any, which economic activities would you like to see grow and develop?

Response Number*	Response Summary	Working Group Response
19 RSPB	<p>The promotion and support of economic growth should be considered within the context of sustainable development, with the economy given equal weight to social and environmental considerations. There must be due recognition of the fact that the natural environment generates and sustains economic activity and brings wider benefits to society¹.</p> <p>At a strategic level, RSPB Scotland believes a more sustainable economy would be aided by the development of new measures of social and economic wellbeing to complement the traditional, but limited measure, of GDP. We agree with the recommendation from the Carnegie report² that there should be a shift in emphasis from measuring economic production to measuring people's wellbeing.</p> <p>¹ Wellbeing through wildlife (RSPB publication) ² http://www.carnegieuktrust.org.uk/getattachment/edc70373-49a0-48bb-84a3-5b0a253a5a6f/More-Than-GDP--Measuring-What-Matters.aspx</p>	<p>AP171: The Sustainable Development policy section will be drafted to ensure the economic benefits of existing economic activity, added value and new development proposals are assessed. Consideration will also be given to developing a policy to assess economic impacts.</p> <p>AP172: A Quality of Life / Well Being policy section will be developed in the Draft Plan.</p>
20 Highland Council	<p>CNSRP's Delivery Plan for the Caithness and North Sutherland area provides a framework for onshore economic development support, and integration with this framework would substantially enhance the currency of the marine spatial plan.</p> <p>The Plan needs to provide for growth and development of a wide range of sectors, supporting existing activities whilst accommodating growth in renewable energy (particularly marine renewables), the oil and gas sector (bearing in mind future activity west of Shetland) and tourism (both marine-based and terrestrial-based tourism).</p>	<p>AP173: Consider the Caithness and North Sutherland Regeneration Partnerships Delivery Plan when developing Draft Plan objectives.</p> <p>AP174: The Sustainable Development policy section will be drafted to ensure the economic benefits of existing economic activity, added value and new development proposals are assessed. Consideration will also be given to developing a policy to assess economic impacts.</p>
21 Scottish Renewables	<p>The plan must support and promote sustainable economic growth. In particular, the plan should support the growth of offshore renewable energy. It should do this by supporting the sectoral planning process and prioritising the areas identified within it by introducing a presumption of use for renewable energy development in these areas. By doing this, the plan will also support the Scottish Government's decarbonisation, renewable energy and climate change targets.</p>	<p>The Draft National Marine Plan policy 'Renewables 1' states 'there is a presumption in favour of the adopted Plan Options identified through the Sectoral Marine Plan process'. The Draft Plan will be in conformity with the policies with the National Marine Plan as required by the Marine (Scotland) Act 2010.</p>

Question 13a. How should the promotion and support of economic growth be considered in the marine spatial plan? If any, which economic activities would you like to see grow and develop?

Response Number*	Response Summary	Working Group Response
	<p>As stated above, Scotland is home to some of the best offshore renewable energy resources in the world and the Pentland Firth and Orkney Waters are the jewel in the crown of our huge marine energy resource. A recent study by Oxford University confirmed that the Firth is the best site in the world for tidal energy.</p> <p>Recent work by Baringa has shown that with the right policy and financial support, the development of renewable generation on the island could have significant socio-economic benefits to the local economies through the creation of direct, indirect and induced jobs. The analysis suggests that by 2020 some 416 full time jobs could be created in Orkney, and by 2030, that number could rise to over 4,500.</p> <p>According to the report, the vast majority of these jobs in Orkney would flow from wave and tidal generation which is labour intensive in the early years, providing the opportunity to develop local supply chains and export expertise.</p> <p>Securing these economic benefits is extremely important for the communities in the Pentland Firth and Orkney Waters area.</p>	<p>AP175: Policies will be drafted that clearly demonstrate the Draft Plan’s support of sustainable development.</p> <p>Noted.</p> <p>Noted. Sustainable economic development and job creation will be supported through the Draft Plan vision and Strategic Objectives.</p> <p>Noted.</p> <p>AP176: The Sustainable Development policy section will be drafted to ensure the economic benefits of existing economic activity, added value and new development proposals are assessed. Consideration will also be given to developing a policy to assess economic impacts.</p>
22 Scottish Wildlife Trust	The economy should be considered within context of sustainable development and the 5 guiding principles of sustainable development as set out in the UK Government Sustainable Development Strategy.	AP177: The economy will form part of the definition of sustainable development within the Draft Plan.
23 Scottish Power Renewables	<p>Question 13a, Page 32</p> <p>The status of the area as a Marine Energy Park should be highlighted within the Draft Plan, which promotes the development of low carbon technologies in order</p>	AP178: The role of the Marine Energy Park will be highlighted and supported in the Draft Plan.

Question 13a

Question 13a. How should the promotion and support of economic growth be considered in the marine spatial plan? If any, which economic activities would you like to see grow and develop?

Response Number*	Response Summary	Working Group Response
	that both the Scottish and UK targets can be met. The potential economic benefit to the area through the development of the marine renewables sector is considered to be of significant benefit.	
24 Orkney Renewables Energy Forum	The promotion of economic growth in this remote region of Scotland should take precedence– it must be the defining priority to ensure that the maximum benefits from the exploitation of our renewable resources are achieved.	AP179: The economy will form part of the definition of sustainable development within the Draft Plan. The Plan will support sustainable economic growth.
25 Scottish Salmon Producers Organisation	(i) See Q4 above. (ii) Salmon farming.	Sustainable aquaculture development will be supported in accordance will the relevant Local Development Plan policies and guidance.
26 Orkney Trout Fishing Association	Comments in Question 19 box.	Noted.
27 Colin Kirkpatrick	Comments in Question 19 box.	Noted.
28 Carol Breckenridge	Tidal and wave power perhaps – depends on damage to environment.	Noted.
29 Highlands and Islands Enterprise	The Pentland Firth and Orkney Waters is home to some of the world’s best wave and tidal energy resources and is already the location of choice for wave and tidal energy developers from throughout the world. The pivotal role that the area already has in developing the global marine energy industry is instrumental in the drive towards commercialisation of the industry. The area offers a coherent, supportive business environment designed to accelerate the commercialisation of wave and tidal stream technologies. Its focus is on the opportunities offered by commercial leasing round in the PFOW but its reach is throughout the Highlands and Islands and the rest of Scotland, bringing leading academic knowledge and unrivalled industry experience together to accelerate the development of the marine energy sector. The plan must support, promote	Sustain economic development and job creation will be supported through the Draft Plan vision and strategic objectives. AP180: The Sustainable Development policy section will be drafted to ensure the economic benefits of existing economic activity, added value and new development proposals are assessed. Consideration will also be given to developing a policy to assess economic impacts.

Question 13a. How should the promotion and support of economic growth be considered in the marine spatial plan? If any, which economic activities would you like to see grow and develop?

Response Number*	Response Summary	Working Group Response
	and sustain economic growth in the PFOW area where we are already seeing the likes of EMEC, Scrabster Harbour, Hatston, Lyness and Wick Harbour being supported however this is just the start of the journey. Securing economic benefits for the population in the PFOW area is of paramount importance.	
30 Dounreay Site Restoration Ltd.	Comments in Question 19 box.	Noted.
32 Scottish Fishermen's Association	<p>Economic growth is surely the prime mover for the plan, but the SFF would stress that growth of any new industry or management regime must not be at the expenses of an old traditional industry.</p> <p>Economic growth is of course important but equilibrium need to be maintained in relevant communities, there would be no good point in growing one industry and losing another. [Comment in relation to 13b]</p>	<p>AP181: The Sustainable Development policy section will be drafted to ensure the economic benefits of existing economic activity, added value and new development proposals are assessed. Consideration will also be given to developing a policy to assess economic impacts.</p>

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Question 13b.Is promoting and supporting economic growth important?

Response Number*	Response Summary					Working Group Response
	Please indicate on a scale of 1 – 5 (1 = Not important at all, 5 = The highest importance)					
	1	2	3	4	5	
1 Marine Biopolymers				X		Refer to Figure 2.6 in the PFOW MSP Consultation Analysis report to view the overall response to Question 12b. The response will be analysed and will inform the preparation of the Draft Plan vision and strategic objectives.
2 Pentland Firth Yacht Club					X	Refer to Figure 2.6 in the PFOW MSP Consultation Analysis report to view the overall response to Question 12b. The response will be analysed and will inform the preparation of the Draft Plan vision and strategic objectives.
4 Orkney Fisheries Association				X		Refer to Figure 2.6 in the PFOW MSP Consultation Analysis report to view the overall response to Question 12b. The response will be analysed and will inform the preparation of the Draft Plan vision and strategic objectives.
5 Scottish Natural Heritage						N/A
6 Scottish Environment Protection Agency						N/A
7 Pentland Canoe Club				X		Refer to Figure 2.6 in the PFOW MSP Consultation Analysis report to view the overall response to Question 12b. The response will be analysed and will inform the preparation of the Draft Plan vision and strategic objectives.
8						Noted.

Question 13b.Is promoting and supporting economic growth important?

Scottish Water						
9 Caithness Kayak Club				X		Refer to Figure 2.6 in the PFOW MSP Consultation Analysis report to view the overall response to Question 12b. The response will be analysed and will inform the preparation of the Draft Plan vision and strategic objectives.
10 Individual					X	Refer to Figure 2.6 in the PFOW MSP Consultation Analysis report to view the overall response to Question 12b. The response will be analysed and will inform the preparation of the Draft Plan vision and strategic objectives.
12 Orkney Sustainable Fisheries Ltd.				X		Refer to Figure 2.6 in the PFOW MSP Consultation Analysis report to view the overall response to Question 12b. The response will be analysed and will inform the preparation of the Draft Plan vision and strategic objectives.
13 Royal Yachting Association				X		Refer to Figure 2.6 in the PFOW MSP Consultation Analysis report to view the overall response to Question 12b. The response will be analysed and will inform the preparation of the Draft Plan vision and strategic objectives.
14 Orkney Sea Kayak Association				X		Refer to Figure 2.6 in the PFOW MSP Consultation Analysis report to view the overall response to Question 12b. The response will be analysed and will inform the preparation of the Draft Plan vision and strategic objectives.
15 Kirkwall Kayak Club				X		Refer to Figure 2.6 in the PFOW MSP Consultation Analysis report to view the overall response to Question 12b. The response will be analysed and will inform the preparation of the Draft Plan vision and strategic objectives.
16 SportsScotland						N/A
17						N/A

Question 13b

Question 13b.Is promoting and supporting economic growth important?

The Crown Estate						
19 RSPB						N/A
20 Highland Council					X	Refer to Figure 2.6 in the PFOW MSP Consultation Analysis report to view the overall response to Question 12b. The response will be analysed and will inform the preparation of the Draft Plan vision and strategic objectives.
21 Scottish Renewables					X	Refer to Figure 2.6 in the PFOW MSP Consultation Analysis report to view the overall response to Question 12b. The response will be analysed and will inform the preparation of the Draft Plan vision and strategic objectives.
22 Scottish Wildlife Trust						N/A
23 Scottish Power Renewables						Response was "Yes". Noted.
24 Orkney Renewables Energy Forum					X	Refer to Figure 2.6 in the PFOW MSP Consultation Analysis report to view the overall response to Question 12b. The response will be analysed and will inform the preparation of the Draft Plan vision and strategic objectives.
25 Scottish Salmon Producers Organisation			X			Refer to Figure 2.6 in the PFOW MSP Consultation Analysis report to view the overall response to Question 12b. The response will be analysed and will inform the preparation of the Draft Plan vision and strategic objectives.
26 Orkney Trout Fishing Association						N/A
27						N/A

Question 13b.Is promoting and supporting economic growth important?

Colin Kirkpatrick						
28 Carol Breckenridge			X			Refer to Figure 2.6 in the PFOW MSP Consultation Analysis report to view the overall response to Question 12b. The response will be analysed and will inform the preparation of the Draft Plan vision and strategic objectives.
29 Highlands and Islands Enterprise					X	Refer to Figure 2.6 in the PFOW MSP Consultation Analysis report to view the overall response to Question 12b. The response will be analysed and will inform the preparation of the Draft Plan vision and strategic objectives.
30 Dounreay Site Restoration Ltd.						N/A
32 Scottish Fishermen's Association						N/A

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Question 14. Having considered Table 9.1, do you have any views on the identified aspirations for growth, strategic issues and opportunities to address the strategic issues in the pilot marine spatial plan?

Response Number*	Response Summary	Working Group Response
1 Marine Biopolymers	<p>I have no issue with the Strategic Issues identified in the table, or with the associated commentary but I would point out the omission of any mention of the “seaweed industry”. Whether you would want to call that Mariculture (although that implies deliberate cultivation of seaweed as opposed to making sustainable use of natural stocks), as a convenient overview name, or the Seaweed Industry is a moot point, although the latter is more accurate.</p> <p>There is clearly potential for conflict between some of the developing economic priorities, but I believe that re-development of a sustainable seaweed industry in the region would work well alongside some activities such as Marine Renewables.</p> <p>It should be noted that, in the historic past, and based on details in historical texts, up to 100,000 (wet) tonnes p.a of seaweed was harvested in Orkney alone – that could, if re-established, lead to businesses with annual revenues exceeding £50 m pa on the assumption of adding value to the seaweed locally. The economic impact to the local economy, although not as large as the above number would probably be of some £25m pa into the local economy</p>	<p>Noted. This will be addressed in the Draft Plan.</p> <p>AP182: Seaweed will be considered under the aquaculture sector of the Draft Plan.</p> <p>Noted. This is dealt with by Guiding Principle 5 in the PIOP.</p> <p>Noted.</p>
2 Pentland Firth Yacht Club	<p>Biodiversity and Natural heritage – On face of it this would be an ideal source for careful exploitation as long as amenity maintained. However must not exploit some species at expense of others. One of the assets of the region is little general disturbance of bio-systems.</p> <p>Cultural heritage and historic environment – This is also an asset that must be preserved and could be exploited. Some compromises may be necessary to allow other users access to region</p> <p>Marine renewable energy – if done acceptably this is an asset that should be carefully exploited as socio-economically beneficial to region and potential beneficial to environment.</p> <p>Electricity grid infrastructure – If carried out in a sympathetic manner then upgrading and extending the electrical infrastructure is a necessary facility to allow other exploitation. The region must not end up as a cable bridge sending</p>	<p>Noted: the accompanying draft Environmental Report aims to assess and address in detail the effects of the various types of development discussed on the environment, including biodiversity, cultural heritage.</p> <p>Noted. See comment above.</p> <p>Noted.</p> <p>Noted: whilst this may be a good idea, it is likely to be technically unfeasible in the short to medium term but</p>

Question 14. Having considered Table 9.1, do you have any views on the identified aspirations for growth, strategic issues and opportunities to address the strategic issues in the pilot marine spatial plan?

Response Number*	Response Summary	Working Group Response
	<p>clean energy elsewhere with limited local benefit. We should consider using our electricity generated locally for creating other opportunities locally.</p> <p>Shipping and Navigation – Although of little local benefit shipping and navigation should still be encouraged as generally beneficial to society. New uses within the region need to be permitted only where safe to do so without unduly compromising shipping.</p> <p>Ports and harbours – As generally brown field sites (although often full of biodiversity) we have no general problem with development and exploitation of our ports and harbours for the benefit of new users. This must be done in a manner that does not unduly compromise or discourage existing users – including leisure use.</p> <p>Oil and Gas – Whilst environmentally damaging hydro-carbon energy remains essential to modern UK society and provides local socio-economic benefit and should continue to be exploited. Controls to be in place to minimise and repair, where possible, the damage.</p> <p>Marine aggregates and dredging – As a general rule we do not support extraction of such resources from this region. However we recognise that we are all consumers of such resources and would reconsider this where it can be demonstrated that less sensitive sources are not available elsewhere. We would not agree to the damage such extraction would cause to such a pristine environment simply for commercial gain. Similarly we would aggressively object to commercial large waste / spoil dumping but accept some limited dumping to assist with other developments.</p> <p>Other infrastructure (e.g. flood and coastal erosion defences) – only if done sympathetically with the culture of the region and acceptable environmental</p>	<p>may be an option for the subsequent Scottish Marine Regional Plans in due course.</p> <p>Noted: shipping is a vital importance to the local economy, providing lifeline ferries, transport of goods and servicing many marine industries, to name a few. The Draft Plan will have a Shipping, Navigation and Marine Safety to help address these issues.</p> <p>Noted: the Draft Plan aims to provide knowledge to allow balanced decisions to be made and these will inform the Ports and Harbours policy. Development of business industrial land in ports and harbours is dealt with in Local Development Plans.</p> <p>Noted.</p> <p>Noted.</p> <p>AP183: A separate dredging and disposal policy sector will be developed.</p> <p>AP184: Potential cultural and environmental impacts will be part of the criteria in the Coastal Protection and Flood</p>

Question 14

Question 14. Having considered Table 9.1, do you have any views on the identified aspirations for growth, strategic issues and opportunities to address the strategic issues in the pilot marine spatial plan?

Response Number*	Response Summary	Working Group Response
	<p>damage.</p> <p>Commercial fisheries – We support sustainable and sensible commercial and leisure fishing. We believe that fishing authorities need to exercise more control such that the sea is farmed rather than just exploited. The quota system does not seem an adequate means for protection for either the fisherman or the resource.</p> <p>Aquaculture – as long as rights of navigation and anchorages for existing users are not impaired in an unacceptable manner we have no objections in principle to this type of farming. We are aware of the serious environmental damage poorly managed / legislated farms cause that must be stopped.</p> <p>Tourism and recreation – we are naturally supporters of environmentally well manage exploitation of the natural resources for the purposes of tourism and recreation. As well the direct fiscal advantages, we believe that such amenities provide a soft benefit to local residents and visitors that enhance the region for the benefit of developers and residents.</p>	<p>Defence section.</p> <p>Noted.</p> <p>Noted. These issues are addressed in the appropriate Supplementary Guidance.</p> <p>AP185: The Sustainable Development policy section will be drafted to ensure the economic benefits of existing economic activity, added value and new development proposals are assessed. Consideration will also be given to developing a policy to assess economic impacts.</p> <p>AP186: A Quality of Life / Well Being policy section will be developed in the Draft Plan.</p>
4 Orkney Fisheries Association	<p>Strategic issues: Knowledge gap on the effects of climate change on commercial fish stocks and fishing activity including how this in turn will affect quotas for fish.</p> <p>Opportunities to address strategic issues: Provide a policy framework that ensures the interests of commercial fisheries</p>	<p>The Draft Planning process will aim to use the most up-to-date data available on climate change effects. However, the effects of climate change on fish stocks and setting quotas are an international/national issue, beyond the remit of the Draft Plan. That said, we shall provide a policy framework that balances the sustainability of existing users, new developments and environmental sustainability.</p> <p>The principle of supporting co-existence and multiple use of marine space is supported by guiding principle 5</p>

Question 14. Having considered Table 9.1, do you have any views on the identified aspirations for growth, strategic issues and opportunities to address the strategic issues in the pilot marine spatial plan?

Response Number*	Response Summary	Working Group Response
	<p>are safeguarded when assessing consent applications for new development. Promote the conservation, enhancement and restoration of commercial stocks and their supporting habitats within the PFOW.</p> <p>Ensure that fishermen maintain the flexibility to be able to respond to the effects of climate change on their stocks in terms of quotas gear types and diversification.</p> <p>Opportunity to highlight the strategic importance of fishing for meeting the growing demand for food.</p> <p>Ensure that local fishermen have a strong voice in the sustainable development of the PFOW.</p>	<p>in the PIOP.</p> <p>AP187: The Sustainable Development policy section will be drafted to ensure the economic benefits of existing economic activity, added value and new development proposals are assessed. Consideration will also be given to developing a policy to assess economic impacts.</p> <p>Noted.</p> <p>Noted.</p> <p>We value input from the OFA. Stakeholder engagement is a vital part of the development of the Draft Plan and the Working Group have consulted on an individual and wider basis throughout the process. The consultation events to date i.e. the workshops, evening drop in sessions and the opportunity for one to one meetings were widely advertised and provided many opportunities to discuss the development of the Draft Plan. There will be sector specific focus groups to work through development of policy for the Draft Plan and these are open to all fishermen that wish to participate.</p>
5 Scottish Natural Heritage	<p>Table 9.1 is very helpful to understanding the basis for identification of key issues and associated opportunities that will inform policy development within the Plan. We broadly agree with the information presented in it, but suggest that there are some omissions and areas where greater detail would be helpful, as follows:</p> <p>Biodiversity and Natural Heritage: suggest that the section on drivers for change explicitly mentions provisions for designation of Marine Protected Areas under</p>	<p>Noted.</p> <p>AP188: A 'drivers for change' section will be part of the Draft Plan and we shall ensure that the information</p>

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Question 14. Having considered Table 9.1, do you have any views on the identified aspirations for growth, strategic issues and opportunities to address the strategic issues in the pilot marine spatial plan?

Response Number*	Response Summary	Working Group Response
	<p>the Marine (Scotland) Act and for designation of marine SPAs under the Birds Directive. Additional strategic issues include declining regional populations of common seals and many species of seabirds and the risk of introduction or spread of marine invasive non-native species (INNS). INNS risk should also be highlighted as an issue with respect to expansion of Shipping and development of Ports and Harbours (and linked to, for example, the provisions of the Ballast Water Management Convention). We note that INNS are explicitly considered within proposed cross cutting and sectoral policies (e.g. see our response below at Proposed Policy Options - Response Box 3 , so presume their omission in this table is an unintended oversight.</p> <p>The Marine Renewable and Energy and Aquaculture sections correctly identify the need to comply with legislation designed to safeguard the environment. However, this also applies to Ports and Harbours developments (particularly during the construction phase) and in all instances should be reflected in an associated Opportunity for the marine plan to provide a policy framework and associated spatial information to guide development to those locations where compliance may be most readily achieved (and hence risks both of significant impacts on the natural heritage and of added costs or delays for developers minimised).Electricity Grid Infrastructure: in addition to impacts of cables (and associated infrastructure) at landfalls, routing at sea, in particular in relation to Marine Protected Areas and Priority Marine Features is also an important consideration.</p> <p>Marine Dredging: the development of the Plan provides an opportunity for strategic review of existing dredge disposal sites to assess their suitability for further disposal of spoil, particularly given likely increase in volumes of such material if aspirations for ports and harbours developments are met.</p> <p>Commercial Fisheries: the statement that there is no clear guidance on acceptable activities within protected areas is somewhat misleading. Under the</p>	<p>supplied regarding MPAs, declining species' populations and INNS are included, as appropriate.</p> <p>AP189: As there is a requirement for all activities to comply with legislation designed to safeguard the environment, this information will be stated at the beginning of the relevant sections of the Draft Plan.</p> <p>Providing constraints and opportunities mapping will be an integral part of the Draft Plan and related supporting documents.</p> <p>Impacts on biodiversity, as covered in the Environmental Report and HRA, will be reflected in the Draft Plan.</p> <p>AP190: Discussions with relevant parties (e.g. the Crown Estate) are providing information that should be available for the Draft Plan to address this issue.</p> <p>AP191: A separate dredging and disposal policy sector will be developed.</p> <p>We note the requirements of the Conservation (Natural</p>

Question 14. Having considered Table 9.1, do you have any views on the identified aspirations for growth, strategic issues and opportunities to address the strategic issues in the pilot marine spatial plan?

Response Number*	Response Summary	Working Group Response
	<p>Conservation (Natural Habitats, &c.) Regulations 1994 (as amended) Marine Scotland is the Competent Authority with respect to management of fisheries activities that might affect the integrity of a European marine (Natura) site (EMS).</p> <p>With respect to the development of Marine Protected Area (MPA) proposals, efforts have been made in advance of the anticipated consultation to provide stakeholders with an indication of the management implications for all proposed sites. The consultation will be supported by Management Options papers in relation to all activities, including fisheries where relevant. Stakeholders have already been engaged in this process via national representatives and at local meetings at a variety of locations from April this year.</p> <p>Other infrastructure: should include potential for creation of fixed links between some of the islands in Orkney; such proposals could exert significant impacts on the marine environment.</p> <p>Other activities: there is already some commercial harvesting of seaweeds in Orkney waters and we anticipate future proposals for new enterprises. Extraction of marine algae, including maerl, has potential to significantly impact the natural heritage and may also increase the risk of coastal erosion. The potential for future cultivation of seaweeds should also be included (under aquaculture).</p>	<p>Habitats, &c.) Regulations 1994 (as amended) and Marine Scotland duty as the Competent Authority with respect to management of fisheries activities that might affect the integrity of a European marine (Natura) site (EMS).</p> <p>We note the content of the Management Options paper.</p> <p>Noted. These issues will be taken into consideration.</p> <p>AP192: Seaweed will be considered under the aquaculture sector of the Draft Plan.</p>
6 Scottish Environment Protection Agency	We have no specific comments to make on the Table but when developing the Plan we would wish you to continually consider potential impacts on local water bodies.	Noted.
7 Pentland Canoe Club	Cultural Heritage & Historic Environment: Caithness Archaeological Trust should be a consultee.	AP193: They will be added to consultation database if permission given.

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Question 14. Having considered Table 9.1, do you have any views on the identified aspirations for growth, strategic issues and opportunities to address the strategic issues in the pilot marine spatial plan?

Response Number*	Response Summary	Working Group Response
	<p>Tourism and Recreation: The area offers some of the UK best (and challenging) sea kayaking in the area. The area should be recognised as offering a destination for adventure tourism (water based) – surfing (board & kayak); sea kayaking; diving; sailing (see www.sailnorth.com) etc.</p>	<p>AP194: A tourism and recreation study will provide data to support this sector's policy development in the Draft Plan. This issue will be considered in the tourism and recreation sections.</p>
<p>8 Scottish Water</p>	<p>Scottish Water notes that discharges are considered a strategic issue in relation to Biodiversity and Natural Heritage.</p> <p>We would state again that, as part of the critical infrastructure supporting safe sanitation for the people of Scotland, the need to discharge safely to the marine environment in compliance with environmental licences needs to be acknowledged.</p>	<p>AP195: Whilst compliance with environmental licences would be at individual project level, we have a cross-cutting policy that covers the water environment. This will address the comment made.</p>
<p>9 Caithness Kayak Club</p>	<p>A lot of thought has gone into this table, with a broad view of the issues. Please continue along these lines.</p>	<p>Noted.</p>
<p>10 Individual</p>	<p>The Interactions Matrix as set out in the PFOW Spatial Plan Framework and the Consultation Paper May 2013 are different in various respects. The main one as concerns Recreational Sailing is that in the Framework it is included with Shipping and Navigation whilst in the Consultation Paper it has been excluded as a separate item. Including it within Recreation and Tourism would tend to mask what are completely different types of operation one being land based in that nights are spent ashore whilst the other being sea based nights are spent on the water. The former would include such items as dinghy sailing, fishing, diving and sight seeing whilst the latter would include cruising boats.</p> <p>Respondent included a table and hand drawn additions to matrix which are available to see here.</p>	<p>Following discussions with our Advisory Group, it was decided that as navigation, along with linked shore-based activities, are key elements of all shipping activities, there was no need to identify individual shipping types in the confines of the matrix. The sectoral topic of shipping and navigation encompasses all craft.</p> <p>Amendments will be made to the individual matrix topics and these will be represented in the appropriate sections but the whole matrix will not be reproduced. As many interactions can have both positive and negative effects, these effects will not be weighted but the key issues will be discussed in the supporting text.</p> <p>AP196: Clarify that all types of craft are considered in the shipping/navigation sections.</p>

Question 14. Having considered Table 9.1, do you have any views on the identified aspirations for growth, strategic issues and opportunities to address the strategic issues in the pilot marine spatial plan?

Response Number*	Response Summary	Working Group Response
		AP197: The different types/levels of impacts will be acknowledged and considered when drafting the Plan.
12 Orkney Sustainable Fisheries Ltd.	Ensure that local fishermen have a strong voice in the sustainable development of the PFOW.	Stakeholder engagement is a vital part of the development of the Draft Plan and the Working Group have consulted on an individual and wider basis throughout the process. The consultation events to date i.e. the workshops, evening drop in sessions and the opportunity for one to one meetings were widely advertised and provided many opportunities to discuss the development of the Draft Plan. There will be sector specific focus groups to work through development of policy for the Draft Plan and these are open to all fishermen that wish to participate.
13 Royal Yachting Association	<p>See earlier comments in relation to question 11a in respect of biodiversity and natural heritage. The impact of recreational boating on biodiversity and the natural heritage is generally rather low, particularly when good practice guidelines are followed.</p> <p>It is a laudable aspiration for Scotland to become world leader in combating climate change and the development of appropriate renewable energy technologies is a means towards achieving that goal. Not all renewable technologies are necessarily useful in that respect. An additional strategic issue for marine renewables is their resilience to extreme wind and wave conditions. This may be impaired by climate change. In shallow waters there can be a significant interaction between wind, swell and tide. The increasing availability of metocean data should be combined with the experience of local users of the sea such as fishermen and recreational boaters to explore these risks.</p> <p>The importance of the Pentland Firth for shipping and navigation may increase if the retreat of the arctic sea ice allows the North-West passage to be opened up</p>	<p>Noted. By undertaking the EIA process, the accompanying Environmental Report aims to assess and address the effects of the various types of development on the environment, including biodiversity and natural heritage.</p> <p>Noted: we would welcome any local knowledge or data that could help shape our Draft Plan. Given the level of investment by developers, they are taking a phased deploy and monitor approach to ensure the proposed equipment is appropriate.</p> <p>AP198: Climate change will be a policy area within the Draft Plan.</p> <p>AP199: Clarify that all types of craft are considered in the shipping/navigation sections.</p>

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	<p>for routine commercial navigation. Increased commercial traffic can constrain the options for recreational craft. Note that navigation issues also apply to small vessels such as recreational boats and inshore fishing boats.</p> <p>Provided that its planning and management is carried out carefully and with appropriate consultation, aquaculture can coexist with sectors such as recreational boating.</p> <p>Facilities for recreation and marine tourism on the north Highlands coast are few in number.</p> <p>Although not many vessels currently round Cape Wrath, there are opportunities for local communities with realistic business plans to develop small scale facilities that may also benefit land-based tourism. Sailors in these waters generally expect to have to anchor so developments may well not involve moorings or pontoons. Clear branding and promotion is indeed important. Coordination with existing promotions will be essential.</p>	<p>Noted.</p> <p>The Draft Plan process will be undertaking a tourism and recreation study as part of a wider national study that may identify opportunities for growth but promoting individual projects as suggested are but outwith the scope of the Draft Plan.</p> <p>AP200: Develop separate tourism and recreation policy sections.</p> <p>Noted.</p>
14 Orkney Sea Kayak Association	No comments.	N/A
15 Kirkwall Kayak Club	No comments.	N/A
16 SportsScotland	We recognise the aspiration for marine renewables. It is crucial that this sector is developed in a sustainable way.	Sustainable development is a cross-cutting theme throughout the Draft Planning process.

Question 14. Having considered Table 9.1, do you have any views on the identified aspirations for growth, strategic issues and opportunities to address the strategic issues in the pilot marine spatial plan?

Response Number*	Response Summary	Working Group Response
	<p>On tourism and recreation (in relation to the table but also generally) reference should be made to sport development needs and aspirations in the area. This will relate to club development, training and competition needs in the area as well as more general participation requirements. Join up with LA sport development and facilities strategies will be important in this regard as will reference to core paths plans and access strategies. It will also be important to engage with Scottish Governing Bodies of Sport and the Highlands and Islands Regional Sporting Partnership to gauge any locational proposals, plans, policies (e.g. facilities strategies, Active Schools engagement) that might exist in the area and be relevant to the plan. Sportscotland can help in this process.</p>	<p>AP201: The Sustainable Development policy section will be drafted to ensure the economic benefits of existing economic activity, added value and new development proposals are assessed. Consideration will also be given to developing a policy to assess economic impacts.</p> <p>We welcome the offer of help but need to ensure the sport aspect is in relation to marine activities within the remit of the Draft Plan.</p>
<p>17 The Crown Estate</p>	<p>Table 9.1 provides a useful summary of the key strategic issues facing the plan area.</p> <p>Table 9.1 states that “the timescales for marine spatial planning in relation to development” are a strategic issue and that “some development proposals will proceed in advance of the statutory marine spatial plan”. We would suggest that reference is made in the Marine Renewable Energy section to the proposed approach of considering the 12 Agreement for Lease areas for wave and tidal stream energy projects as ‘Planned Developments’ as in Proposed Policy 11 (see below).</p>	<p>Noted</p> <p>AP202: The Draft Plan will include reference to the current sites with an Agreement for Lease.</p>
<p>19 RSPB</p>	<p>Biodiversity</p> <p>‘data gaps’ section: should include species ecology and behaviour in addition to the knowledge gaps which refers to effects of some marine sectors on habitats, species and ecosystems.</p>	<p>AP203: This information will be taken into consideration in drafting the Draft Plan.</p>

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Question 14. Having considered Table 9.1, do you have any views on the identified aspirations for growth, strategic issues and opportunities to address the strategic issues in the pilot marine spatial plan?

Response Number*	Response Summary	Working Group Response
	<p>'opportunities to address strategic issues in the pilot marine spatial plan': this section should include consideration of measures that would increase the plan's resilience to climate change e.g. adaptive management that identifies potential future scenarios specific to the region and responding with innovative solutions to counter the effects of these predicted impacts.</p> <p>For Marine Renewable Energy the strategic issues section should include marine habitats and species under the second bullet point for 'risks and barriers'.</p>	<p>Climate change considerations are one of the guiding principles of the marine spatial plan process and will therefore be considered across all of the sectoral topics.</p> <p>AP204: Climate change will be a policy area within the Draft Plan.</p> <p>AP205: This information will be taken into consideration in drafting the Draft Plan.</p>
20 Highland Council	<p>Cultural Heritage and Historic Environment – In Table 9.1, “the wider area of Caithness and north Highland” would better read “Caithness and the wider area of north Highland”. In referring to potential damage to archaeological assets, reference should be made to consideration of significant adverse impacts on features, including on setting of features where relevant.</p> <p>Marine Renewable Energy – The reference in Table 9.1 to lack of grid infrastructure might better refer to “lack of grid infrastructure and/or limited current grid capacity”. The reference to cooperation between Orkney and Caithness might better refer to “cooperation between Orkney and North Highland”, bearing in mind the Plan area proposed.</p> <p>Electricity Grid Infrastructure – The current wording might suggest that all Grid upgrades are dependent upon Orkney links, when there is already substantial work planned for the north mainland irrespective of Orkney links, plus there are plans for sub-sea links southwards to the Moray coast, as illustrated in the recent consultation on National Planning Framework 3. Table 9.1 needs rewording to reflect this. Also, whilst it is appreciated that the Table is not attempting to describe all types of electricity grid infrastructure, it would be worth mentioning converter stations in addition to substations and power cables as these are likely to be a significant feature of development proposals in or near the Plan area. In referring to the need to consider the impact of cables making</p>	<p>AP206: This information will be taken into consideration in drafting the Draft Plan.</p> <p>AP207: This information will be taken into consideration in drafting the Draft Plan.</p> <p>AP208: This information will be taken into consideration in drafting the Draft Plan.</p>

Question 14. Having considered Table 9.1, do you have any views on the identified aspirations for growth, strategic issues and opportunities to address the strategic issues in the pilot marine spatial plan?

Response Number*	Response Summary	Working Group Response
	<p>landfall on coastal areas, it would be useful to mention cumulative impacts of multiple landfalls.</p> <p>Shipping and Navigation – Table 9.1 should more clearly reflect that passage in the Pentland Firth is not only through the firth but also across it e.g. ferry routes, and mention could also be made here of visiting cruise ships. With regard to the recognition that the economic and strategic importance of shipping is required to support almost all other marine sectors, Table 9.1 could also acknowledge that it also is required to support some key terrestrial sectors/activities.</p> <p>Ports and Harbours – Gills harbour should be mentioned, both in terms of its role in marine energy and as a ferry port.</p> <p>Oil and Gas – Scrabster Harbour will be the site for an Oil Supply Base for West of Shetland fields and this should be referred to. See http://www.norseagroup.com/media-center/news-archive/norsea-group-invests-in-its-first-supply-base-in-scotland.aspx Indeed whilst Table 9.1 correctly acknowledges long term contraction of the sector, it should also refer to short/medium term activity and new business opportunities in the sector. With regard to the reference to subsea telecommunications links, this may more appropriately be considered as a sector in its own right, and in that regard we note that the consultation document has identified it for a proposed sectoral policy.</p>	<p>AP209: This information will be taken into consideration in drafting the Draft Plan.</p> <p>AP210: This information will be taken into consideration in drafting the Draft Plan.</p> <p>AP211: This information will be taken into consideration in drafting the Draft Plan.</p>
21 Scottish Renewables	<p>Identifying Strategic Issues and Interactions</p> <ul style="list-style-type: none"> • Healthy and Biologically Diverse Seas <p>Levels of protection should be in some way linked with the findings of the Marine Atlas. For example, the Marine Atlas finds that the PFOW area (North Scotland Coast) has no significant concerns in relation to the ‘clean and safe’ parameters assessed and habitats are in a relatively good condition. However, seabird, harbour seals and some commercially exploited fish are highlighted as species of concern. The decline in seabird numbers is suggested to be linked to</p>	<p>AP212: When drafting the Plan, we shall clarify the links to key documents such as the Marine Atlas, which have been used to underpin the Draft Plan.</p>

Question 14. Having considered Table 9.1, do you have any views on the identified aspirations for growth, strategic issues and opportunities to address the strategic issues in the pilot marine spatial plan?

Response Number*	Response Summary	Working Group Response
	<p>a shortage of key prey species associated with changes in oceanographic conditions.</p> <p>We fully support further research being carried out to aid the development of the plan.</p> <p>We seek further guidance on ‘research, deploy and monitor’ in relation to the development of marine renewables, specifically on whether this refers directly to Marine Scotland’s ‘survey, deploy and monitor’ policy?</p> <p>We would support standard methods for data collection and surveying from Marine Scotland. However, care must be taken in relation to setting standards for data collection from the marine renewables industry. Recent discussions through SMRRG highlighted that survey methods are maturing and developing with the industry and therefore it was not appropriate to stipulate exactly ‘how’ surveys should be carried out. More beneficial is guidance on exactly what outputs regulators require to see from surveys, and regulators should be less prescriptive on exactly <i>how</i> those outputs are achieved.</p> <p>We seek further detail on what a policy framework for assessing developments may contain.</p> <ul style="list-style-type: none"> • Marine Renewable Energy <p>The pilot plan must be consistent with the sectoral plans. In relation to timescale requirements for data, reference should be made to Marine Scotland’s survey, deploy and monitor policy. In particular, we support the aims of promoting PFOW as a centre of excellence for renewable energy, taking advantage of energy export opportunities, the development of wider socio-economic opportunities and the recognition of the need for improved local infrastructure. We also welcome the recognition of the importance of access to grid.</p> <ul style="list-style-type: none"> • Shipping and Navigation 	<p>Noted.</p> <p>AP213: More detail will be provided on this aspect in the Draft Plan: it relates to the methodology proposed by MS to assess the impacts of the emerging wave and tidal devices.</p> <p>Noted.</p> <p>This will be in the form of the Draft Plan.</p> <p>AP214: Now that the draft sectoral plans, National Marine Plan and proposed MPA sites have been published, we will ensure that the Draft Plan is consistent with them. The survey, deploy and monitor policy will also be taken into account.</p>

Question 14. Having considered Table 9.1, do you have any views on the identified aspirations for growth, strategic issues and opportunities to address the strategic issues in the pilot marine spatial plan?

Response Number*	Response Summary	Working Group Response
	<p>It states here that the plan is „statutory“ , which is at odds with previous sections which stated it was non-statutory whilst the RMPs would be statutory in nature. Clarification should be given here.</p> <p>Table 9.1, Page 38, Shipping and Navigation</p> <p>Clustering of marine developments is considered here in mitigation to shipping activities. However, this may well lead to resource conflicts between the developments. Therefore, this should not be a consideration of the plan as it has wider implications to the renewables sector. Shipping interactions should be considered by the developers of projects and minimised at a project level.</p>	<p>AP217: This refers to the subsequent Regional Marine Plans which will be statutory as opposed to this pilot Plan, which is not. Text will be clarified accordingly.</p> <p>Clustering of development does not refer to renewables development specifically; it may be an appropriate for e.g. the aquaculture industry where Integrated Multi Trophic Aquaculture (IMTA) is being proposed by Scottish Government.</p>
24 Orkney Renewables Energy Forum	No further comments to make	N/A
25 Scottish Salmon Producers Organisation	<p>For SSPO one of the primary strategic issues in the PFOW area is the Scottish Government’s contradictory policies whereby it seeks the substantial growth in the fish farming industry whilst at the same time maintains a ban on any new fish farms on the north and east coasts. As referred to above, there is no scientific basis or justification for such a ban on the farming of finfish generally on these coastlines.. Within the next 10-20 years, i.e. the plan period, it is likely that the farming of a number of species of fish will become not only feasible but essential as catch stock reduces worldwide. To ban all forms of fish farming from approximately half of the Scottish coastline for no apparent reason therefore seems short sighted if not perverse.</p> <p>Another strategic issue is the growing potential for fish farming to take place further out to sea, possibly beyond the 3NM point, and in conjunction with other forms of marine development. In order to encourage investment in research into such technologies as will be required, the Plan ought to be positively disposed to such developments.</p>	<p>This issue is outwith the remit of the Draft Plan, which must conform to national policy.</p> <p>Although the Marine Atlas states that one aquaculture company has the desire to move off-shore, to date there has been limited interest from others in the industry to pursue development in deeper waters within the plan area. Should proposals come forward within the development of the Plan, it will try to accommodate such</p>

Question 14. Having considered Table 9.1, do you have any views on the identified aspirations for growth, strategic issues and opportunities to address the strategic issues in the pilot marine spatial plan?

Response Number*	Response Summary	Working Group Response
	<p>A third strategic issue for the industry is the continuing uncertainty about where salmon farming will be accepted. The Plan ought to address this issue.</p> <p>(See responses to Q4 and Q10 above.)</p>	<p>development if appropriate. National consideration to legislation and policy will be required.</p> <p>Noted. Like all other sectors, individual development will be assessed on a site by site basis. Aquaculture provides an important part of the marine economy in the Plan area and it is likely to continue to do so. The Plan process will provide support for the industry by having aquaculture policy that supports sustainable growth of the industry in appropriate locations.</p>
26 Orkney Trout Fishing Association	Comments in Question 19 box.	Noted.
27 Colin Kirkpatrick	Comments in Question 19 box.	Noted.
28 Carol Breckenridge	The development of infrastructure of land and sea – e.g. at Dunnet Head will destroy its unique cultural heritage and nature.	Noted. Supporting sustainable development opportunities is a fundamental part of the Plan process and is necessary to support local community viability. However, all individual development proposals will have to ensure that any impacts on the environment are assessed, minimized and mitigated where appropriate.
29 Highlands and Islands Enterprise	It is rather difficult to comment on this table as the key issues and interactions were taken from a series of consultation workshops with stakeholders to identify the likely interactions between marine sectors and activities. This information has been reviewed by the Working Group in consultation with stakeholders therefore we feel all areas have been addressed.	Noted.
30 Dounreay Site Restoration Ltd.	Comments in Question 19 box.	Noted.

Question 14

Question 14. Having considered Table 9.1, do you have any views on the identified aspirations for growth, strategic issues and opportunities to address the strategic issues in the pilot marine spatial plan?

Response Number*	Response Summary	Working Group Response
32 Scottish Fishermen's Association	The SFF would be concerned that the drive to eco-tourism could lead to our peripheral communities being treated more as theme parks than living dynamic areas. Indeed the table would seem to understate just how important fishing is to the area now and in the future.	AP218: When drafting the Plan we will consult with the SFF again to get detailed information for inclusion. Tourism is a key economic sector and many come to enjoy the 'wild' nature of the natural land and seascapes, therefore bearing little relation to theme parks.

*Responses number 3 and 31 were in relation to the draft Environmental Report and are not included here. Response number 11 cannot be made public as a Respondent Information Form was not received and number 18 was from an individual that did not give permission to make their response public.

Question 15. Having considered Table 9.2, do you have any views on the identified potential for interaction between the various sectors, what these interactions might be and how these interactions should be addressed in the pilot marine spatial plan?

Response Number*	Response Summary	Working Group Response
1 Marine Biopolymers	<p>The ones shown in the table make eminent sense to me, and I am not qualified to comment on the extent and scale of the interactions identified</p> <p>I would simply say again that another category i.e. Seaweed Industry should be included, given its potential scale and economic impact, and the interactions arising worked out – probably similar to those of Aquaculture and Commercial Fisheries, but with some notable differences, and also depending on the exact nature of any industry that would develop</p>	<p>Noted.</p> <p>AP219: The Scottish Government is, at the time of writing, developing draft seaweed policy which will help inform the Draft Plan.</p> <p>AP220: Seaweed will be considered under the aquaculture sector of the Draft Plan.</p>
2 Pentland Firth Yacht Club	<p>The spatial plan needs to consider all aspects of current users and new users in an integrated manner. There will likely always be an impact between sectors and local residents and necessary compromises need to be understood and agreed. Such a system needs to be dynamic as environmental knowledge, technology, economics and demand will continuously change.</p>	<p>This is a key challenge of drafting the Plan, hence our strive to ensure all sectors and stakeholders are involved in the process.</p>
4 Orkney Fisheries Association	<p>Biodiversity and Natural Heritage: Intermediate to low interaction. It would be useful to note in the pilot plan that the impacts on marine biodiversity vary between gear types (e.g. creeling is very low-impact). Maintaining biodiversity will help ensure a productive and sustainable fishery</p> <p>Climate Change Intermediate interaction Possible changes in the abundance of commercial stocks. Possibility of increased fishing effort in more sheltered inshore areas as a result of frequent extreme weather events. The pilot plan should recognise that fishermen require spatial flexibility to be able to respond to the effects of climate change on their stocks. The pilot plan should identify appropriate mitigation measures for responding to increased fishing pressure in inshore waters, both for the fishery itself and other sectors.</p> <p>Cultural Heritage and Historic Environment: Minor interaction to no interaction.</p>	<p>AP221: The Working Group will discuss with local fisheries stakeholders to ensure the main types of fishing gear are considered.</p> <p>The Draft Plan is not adopting a strict zoning approach to allow flexibility but stock management is beyond the scope of the Plan. However, we would welcome further input from fishermen to ensure their interests are represented. Climate change has the potential to change the species mix e.g. introduce invasive species that were previously unsupported in the PFOW area, potentially resulting in major effects.</p> <p>As fisheries are important part of Orkney's cultural</p>

Question 15. Having considered Table 9.2, do you have any views on the identified potential for interaction between the various sectors, what these interactions might be and how these interactions should be addressed in the pilot marine spatial plan?

Response Number*	Response Summary	Working Group Response
	<p>Fisheries are and important part of Orkney’s cultural heritage and the pilot plan should bring awareness to this fact. Links to positive cultural identity enhance ‘well-being’.</p> <p>Water and Marine environment As with biodiversity and natural heritage.</p> <p>Marine Renewables: Major interaction Potential impacts on fish and shellfish ecology (from habitat removal, noise, EMF and potential risks of collision). Potential for displacement of fishing effort to other areas with knock-on implications for sustainability of stocks. Restriction of movement for fishing vessels due to implementation of exclusion zones. Recommend the plan ensures development is steered away from fishing grounds, especially spawning and nursery grounds and any habitat e.g. maerl, that supports immature commercial stocks.</p> <p>Aquaculture Major interaction Organic enrichment (from waste feed, faecal matter, chemical pollutants) causing anoxia, algal blooms, changes in sediment quality and benthic species composition. Effects can spread to as far as 1.2km from salmon cages (Milewski,2001) depending on intensity and direction of currents. Effects on local fishery potentially profound, especially if salmon farms are located close to important spawning grounds and habitat (eg maerl beds) for commercially important species such as king scallop (<i>Pecten Maximus</i>). Displacement of divers and creelers from prime fishing grounds is a serious concern with regard</p>	<p>heritage, as well as the north coasts of Caithness and Sutherland’s within the Draft Plan area, there is a significant intermediate effect. Amendments will be made to the individual matrix topics and these will be represented in the appropriate sections but the whole matrix will not be reproduced. As many interactions can have both positive and negative effects, these effects will not be weighted but the key issues will be discussed in the supporting text. The cultural aspects will be added to the quality of life/well being policy sector.</p> <p>Noted.</p> <p>AP222: Additional text in the Draft Plan will explore these effects.</p> <p>Noted. Any additional site specific data the OFA can supply will be most welcome. Given a number of sites are in various development stage for renewable energy, there may be potential for these to also act as additional nursery grounds e.g. wave development sites.</p> <p>The Scottish Government have target to increase production by 32% by 2020, based on 2011 baseline (159,269 tonnes). In addition, much research has been undertaken on the impacts of aquaculture. With regard to effects of chemotheraputents, this is regulated by SEPA, whilst the farmed fish health is governed by MS and local authority planning permission is required for the site equipment. Where Priority Marine Features</p>

Question 15. Having considered Table 9.2, do you have any views on the identified potential for interaction between the various sectors, what these interactions might be and how these interactions should be addressed in the pilot marine spatial plan?

Response Number*	Response Summary	Working Group Response
	<p>to aquaculture developments. The pilot plan should address this conflict by conferring a priority to fisheries when a negative interaction between the two sectors is likely to occur.</p> <p>Recreation and tourism Minor to intermediate interaction. When large cruise ships come into Kirkwall, entry to the inner harbour is restricted for fishing boats. Tender vessels from cruise ships can displace boats from their normal berths and have in the past caused damage to vessels undergoing repairs beached on the hard standing due to wash from tenders entering and exiting the harbour basin at speed.</p> <p>There is potential for conflict between the legitimate needs of a working harbour for large vehicle access and storage of fishing gear and the aesthetic aspirations of the tourism.</p>	<p>(PMF), such as Maerl and Horse Mussel beds, which are also protected under Annex 1 of the Habitats Directive, are present, protection will be required from all activity likely to cause significant damage. Given the relative percentage of sea area required for aquaculture in relation to that required for commercial fishing, a reasonable balance must be struck to support both industries.</p> <p>AP223: The cruise ship aspect is currently discussed in the shipping section but will be cross-referenced to the tourism section and the comments taken into consideration. A Shipping Study of the PFOW was carried out to inform the Draft Plan therefore will provide detailed information on key shipping routes in relation to the Scotmap data for small boat (< 15m) fishing.</p> <p>AP224: Noted: we shall address this in the Draft Plan.</p>
5 Scottish Natural Heritage	<p>We support the use of interactions matrices to inform marine planning and agree with the scoring in Table 9.2 with exception of the interaction between ports and harbours and biodiversity and the natural heritage which we would class as major, rather than intermediate (on basis of potential significance of interactions during construction [e.g. with respect to noise impacts on cetaceans] and also of secondary impacts associated with increased shipping activity). We also question the inclusion of ICZM in this matrix as we would view it as a tool to address interactions rather than as a sector or cross-cutting issue.</p>	<p>AP225: The comments will be taken into consideration when drafting the Plan.</p> <p>We consider ICZM to be a cross-cutting issue as well as a planning tool in the same way as marine spatial planning is both. It is important that the intertidal area is covered by the marine Draft Plan but the Plan must also be compatible with the relevant Local Plan in the two Local Authority areas as both produce marine and terrestrial plans that overlap between MHSW and MLWS.</p>

Question 15. Having considered Table 9.2, do you have any views on the identified potential for interaction between the various sectors, what these interactions might be and how these interactions should be addressed in the pilot marine spatial plan?

Response Number*	Response Summary	Working Group Response
	<p>However, we advise that more specific information will be needed on interactions to usefully inform the Plan. For example, the nature and likely significance of interactions between commercial fisheries and the natural heritage is highly dependent upon the type of fishing and gear and on its location in relation to sensitive habitats or species.</p> <p>Information on some key potential interactions between marine activities and the natural heritage is available through our Managing Coasts and seas page on our website (http://www.snh.gov.uk/land-and-sea/managing-coasts-and-sea/) We also suggest that, with respect to Priority Marine Features, the ongoing work on development of management options for Marine Protected Areas (MPAs) proposals may provide valuable information on key interactions.</p> <p>We consider that a spatial element to the Plan will be critical to refining understanding, and hence management, of interactions (both positive and negative) between interests (see response to Q16). In this context, while we support the general aspiration identified at 9.5 for the Plan to focus on identifying solutions rather than constraints, we would suggest that, in some instances the constraints on certain activities at particular locations may be sufficiently great to merit their explicit identification within the Plan (e.g. the use of narrow straits for passage by vulnerable populations of marine mammals is likely to constrain options for development of arrays of tidal turbines).</p> <p>We are happy to provide further input to the consideration of interactions with the natural heritage and to advise on associated policy development via the Plan advisory group and/or other meetings or workshops.</p>	<p>AP226: Much more information will be provided in the Draft Plan. The PIOP, by its very nature, could only set out general policy and sectoral information.</p> <p>It would be helpful if SNH could provide specific information/text they think should be included for the next stage i.e. the drafting of the Plan.</p> <p>AP227: Noted; we recognize that some areas are likely to be less appropriate for development and key constraints will be mapped.</p> <p>Noted; offer of help welcomed.</p>
6 Scottish Environment Protection Agency	By the very nature of the Plan, we agree that "Water and Marine Environment" will have a major interaction with all aspects of the Plan.	Noted.
7	The interaction between recreation/tourism and marine renewables should =be	AP228: The installation phase will be for a specified

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Pentland Canoe Club	a major interaction. During the installation and operation & maintenance phases there will be significantly increased shipping activity in the area. A full deployment there could be on average 1 device per day being removed from the water for planned maintenance. The activity for unplanned maintenance is unknown. This will increase the shipping hazard significantly to recreational water users in particular sail and kayaking). There is also a potential increase in noise pollution (eg during installation) which could impact on tourism.	period therefore the effects of increased shipping will be temporary, whilst the maintenance phases will be on an as required basis, again not a continuous operation. Not all of the additional shipping movements will coincide with recreational users. Amendments will be made to the individual matrix topics and these will be represented in the appropriate sections but the whole matrix will not be reproduced. As many interactions can have both positive and negative effects, these effects will not be weighted but the key issues will be discussed in the supporting text.
8 Scottish Water	<p>The matrix identified areas of major, intermediate or minor interaction but did not distinguish between positive and negative effects; as such we did not find it as informative or meaningful as had positive and negative interactions been identified. It was perhaps not detailed enough to inform a Regional Marine Plan. We would recommend that the location of incompatible activities is given equal consideration as compatible activities. The development of an incompatible activity near an established legitimate activity, such as a licensed discharge, may lead to requests for enhanced levels of treatment beyond that agreed and set out in the licence; resulting in additional costs in terms of carbon and financial cost.</p> <p>Co-existence through appropriate management of incompatible activities, as suggested in the plan, may result in one sector bearing the burden of financial costs associated with a management regime</p>	<p>This aspect has been discussed but as many of the sectors and issues can have both positive and negative effects, this may be overlooked if reading matrix in a simplified 'red, amber, green' approach without the supporting text. Given the issues above, the actual matrix will not be reproduced in an updated from in the Draft Plan, but appropriate explanatory text will be used instead to highlight interactions.</p> <p>Constraints mapping will be used where appropriate; it would be helpful if Scottish Water could provide input of particularly sensitive sites when we come to draft the Plan.</p> <p>If activities are incompatible, they are unlikely to both go ahead unless one or both parties are in agreement with the developments and associated costs. This will be for developers to negotiate on a project by project basis.</p>
9 Caithness	I think the interaction between tidal/wave energy developments and recreation should be increased in respect of water users. Local kayak clubs have already	AP229: The installation phase will be for a specified period therefore the effects of increased shipping will be

Question 15

Question 15. Having considered Table 9.2, do you have any views on the identified potential for interaction between the various sectors, what these interactions might be and how these interactions should be addressed in the pilot marine spatial plan?

Response Number*	Response Summary	Working Group Response
Kayak Club	been liaising with Meygen over the Inner Sound plans, and such liaison will be necessary in the future right across the area.	temporary whilst the maintenance phases will be on an as required basis, again not a continuous operation. Not all of the additional shipping movements will coincide with recreational users there we shall therefore considered these comments when drafting the Plan and provide explanatory text where appropriate.
10 Individual	See previous question.	Noted.
12 Orkney Sustainable Fisheries Ltd.	No comment	N/A
13 Royal Yachting Association	<p>The matrix approach exemplified by Table 9.2 suffers from three weaknesses.</p> <p>First, many interactions are contingent on other factors. For example, tidal energy generators 8 m below keel depth will have no impact on recreational boating but ones with surface piercing elements will. Similarly, well planned aquaculture units have little impact but badly located ones can have a major negative impact by preventing safe access to anchorages</p> <p>Secondly, many sectors are heterogeneous so that the impact on one part may be trivial but on others significant.</p> <p>Thirdly some interactions are location specific. Whether or not a wave generation installation is a serious hazard will depend on whether there are safe alternative routes. The various coastal partnerships did work on interactions between sectors and tried to overcome these deficiencies. If the matrix is to be used as an evidence base for policy making then it needs considerably more work before we would find it acceptable.</p>	AP230: Many of the sectors and issues can have both positive and negative effects, as noted in the matrix key. Amendments will be made to the individual matrix topics and these will be represented in the appropriate sections but the whole matrix will not be reproduced. As many interactions can have both positive and negative effects, these effects will not be weighted but the key issues will be discussed in the supporting text. Given the complexity of marine users, the Plan can only offer guidance to the most parsimonious solutions whilst acknowledging more detailed planning will be required by individual developer projects.
14 Orkney Sea Kayak Association	Query regarding “minor interactions” between other sectors and Recreation and Tourism. Often it appears that no impact has been given. However there will always be an impact no matter how minor, so surely ‘minor impact ‘ should have been recorded as a minimum?	AP231: Amendments will be made to the individual matrix topics and these will be represented in the appropriate sections but the whole matrix will not be reproduced. As many interactions can have both positive and negative effects, these effects will not be weighted

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		but the key issues will be discussed in the supporting text. Whilst there may be very minor impacts for the other sectors, the matrix needs to be realistic in providing proportionate information and guidance rather than assessing every possible very minor interaction. These comments will be taken into consideration when drafting the Plan. Further detail on interactions will be provided in the Draft Plan, providing further opportunity to comment.
15 Kirkwall Kayak Club	No comments.	N/A
16 SportsScotland	No comments.	N/A
17 The Crown Estate	<p>Managing the interaction between sectors and competing activities is a key issue to be addressed by the plan and should therefore constitute one of the key objectives of the plan. Please also see our comments in response to question 4.</p> <p>The management of interactions in the plan should be evidence based, informed by a practical understanding of how activities interact from a technical perspective. Acceptable proximity distances will become an important issue as discussions regarding co-existence and co-location develop.</p>	<p>Noted: this is a major challenge for regional marine spatial planning.</p> <p>AP232: Amendments will be made to the individual matrix topics and these will be represented in the appropriate sections but the whole matrix will not be reproduced. As many interactions can have both positive and negative effects, these effects will not be weighted but the key issues will be discussed in the supporting text.</p>
19 RSPB	No comments	N/A

Question 15. Having considered Table 9.2, do you have any views on the identified potential for interaction between the various sectors, what these interactions might be and how these interactions should be addressed in the pilot marine spatial plan?

Response Number*	Response Summary	Working Group Response
20 Highland Council	<p>Defence should be added in to Table 9.2 as an additional, discreet sector.</p> <p>In Table 9.2, if Marine Renewables is intended to cover not only wave and tidal but also offshore wind then this should be made clear.</p>	<p>A233: Amendments will be made to the individual matrix topics and these will be represented in the appropriate sections but the whole matrix will not be reproduced. As many interactions can have both positive and negative effects, these effects will not be weighted but the key issues will be discussed in the supporting text. These comments will be taken into consideration when drafting the Plan.</p> <p>AP234: This will be clarified in the supporting text.</p>
21 Scottish Renewables	<p>It is unclear how table 9.2 has been developed and how the proposed level of interaction has been decided. Many of these interactions are already considered and addressed through the RLG and the sectoral marine planning process. Further, through groups including NOREL, FLOWW and the Scottish Government’s Fishing Focus Group, guidance to help with potential interactions between the marine renewables industry and other sectors, including shipping and fisheries, is being developed. The plan should not try to duplicate the work of these groups and should instead refer to where industry wide guidance has been, or is being, developed.</p>	<p>As noted in the original matrix in the RLG, <i>“it will be refined and updated...during the development of the MSP, as more detailed information on different sectors and activities is generated”</i>.</p> <p>AP235: Amendments will be made to the individual matrix topics and these will be represented in the appropriate sections but the whole matrix will not be reproduced. As many interactions can have both positive and negative effects, these effects will not be weighted but the key issues will be discussed in the supporting text. The comments provided will be taken into consideration when drafting the Plan.</p> <p>AP236: We shall seek out the information held by the groups listed. This MSP process is looking at all sectors, not just marine renewables and will pull the relevant information together in one document, with signposting to specific technical guidance where appropriate.</p>
22 Scottish	No comments.	N/A

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Response Number*	Response Summary	Working Group Response
Wildlife Trust		
23 Scottish Power Renewables	<p>Question 15, Page 45</p> <p>It is not clear in Table 9.2 what “Other Infrastructure” is and, for instance, why commercial fisheries do not interact with it, however marine renewables does.</p> <p>Additionally, some of the levels of interaction in relation to marine renewables will be technology specific and also relate to the proposed development site. This should be stated somewhere as it is not currently considered.</p>	<p>AP237: Text will be provided in the Draft Plan to clarify: the term relates to infrastructure that is largely terrestrial/intertidal but not covered by other categories e.g. flood defences. As all marine renewables will require landfall for cables and sub-stations there is potential for interaction whereas fishing is unlikely to have discernible impacts and vice versa.</p> <p>The PIOP aimed to set out proposed general policy themes and issues. The Draft Plan will also provide much greater detail on all of the sectors.</p>
24 Orkney Renewables Energy Forum	<p>The interaction between marine renewables and recreation and tourism may be understated in being classified as ‘minor’. Business tourism in Orkney in connection with marine renewables is a growth area of the tourism sector. Furthermore, many are known to have returned to the islands on holiday after initially visiting on business.</p>	<p>AP238: Amendments will be made to the individual matrix topics and these will be represented in the appropriate sections but the whole matrix will not be reproduced. As many interactions can have both positive and negative effects, these effects will not be weighted but the key issues will be discussed in the supporting text. The comments provided will be taken into consideration when drafting the Plan: see response to comment 7.</p>
25 Scottish Salmon Producers Organisation	<p>Yes. See second paragraph of response to Q14.</p>	<p>Noted.</p>
26 Orkney Trout Fishing Association	<p>Comments in Question 19 box.</p>	<p>Noted.</p>
27	<p>Comments in Question 19 box.</p>	<p>Noted.</p>

Question 15

Question 15. Having considered Table 9.2, do you have any views on the identified potential for interaction between the various sectors, what these interactions might be and how these interactions should be addressed in the pilot marine spatial plan?

Response Number*	Response Summary	Working Group Response
Colin Kirkpatrick		
28 Carol Breckenridge	Promotion of archaeology and of archaeological research before infrastructure is urgently needed. Development too fast.	AP239: The Draft Plan will set out guiding policy to ensure it is a key consideration. All development will have to take the significant archaeological interests in the area into account. As part of 'Project Adair' marine heritage sites in the PFOW have been mapped and will therefore provide data for the Draft Plan that will also help inform developers.
29 Highlands and Islands Enterprise	HIE are unable to comment on this table other than flagging up the fact there are a number of interactions already taking place and being developed and therefore should be taken into consideration and not duplicated within this piece of work.	AP240: A key aim of the Plan is to provide information on all the sectors and issues in one place, signposting where appropriate. Text will be provided to discuss existing sectors/activity and planned development.
30 Dounreay Site Restoration Ltd.	Comments in Question 19 box.	Noted.
32 Scottish Fishermen's Association	Commercial fishing will have more than a minor impact on ICZM, Oil and Gas, and more than an intermediate interaction with marine aggregates and dredging.	AP241: We shall consult further with the SFA further to get data to support any changes.

*Responses number 3 and 31 were in relation to the draft Environmental Report and are not included here. Response number 11 cannot be made public as a Respondent Information Form was not received and number 18 was from an individual that did not give permission to make their response public.

Question 16. Do you think it is important to have an overarching spatial strategy? If so, what should the strategy include and why?

Response Number*	Response Summary	Working Group Response
1 Marine Biopolymers	Especially in the Orkney part of the region, with its myriad islands and extended coastlines, it is key to have an overarching spatial strategy which is a baseline reference for all parties. It should perhaps not be as black and white as indicating “do’s and don’t’s” or “can’s and can’t’s” but it would certainly be very beneficial for e.g. any new business proposing a development with a marine aspect to be aware of the local situation, and, if considered to be developed, and subsequently managed carefully over the longer term, fairly and with due consideration for all, it would be a very valuable document/tool (whatever one wants to call it)	Noted.
2 Pentland Firth Yacht Club	Yes. See answer to question 15. The spatial strategy, as seems to be the plan, needs to include: Local amenities and residents; existing users; new planned users; possible future uses; impacts (environment, geology etc.) Exploitation, unless complete benign (unlikely) should only be permitted where: Of general society / socio-economic benefit and not just for fiscal benefit; environmental / archaeological etc. damage is acceptable; the compromises necessary from existing users are reasonable.	Noted: it is hope this Plan will help ensure the type of sustainable development suggested by providing information on all the sectors and issues in one document.
4 Orkney Fisheries Association	Uncertain as we believe a ranking strategy on existing users should be defined ordered by historical access and use underpinned by the fundamentals of human need which is food. Any fixed or inflexible strategy for the sea could work against the dynamic interests of fishing which require maximum flexibility.	Noted: the Draft Plan will adopt a flexible approach to its policies.
5 Scottish Natural Heritage	Following from Q15, we strongly support the need for an overarching spatial strategy within the Plan. With respect to natural heritage interests, particular consideration will be needed as to how to present spatial information on mobile species (e.g. cetaceans) and related concepts and potential constraints such as connectivity between European sites and the features for which they are protected (e.g. some types of development within PFOW may have potential to impact upon Natura sites outwith the Plan area. While we would not favour prescriptive zoning and creation of fixed lines on maps there may be scope to provide broad indications of areas of higher or lower levels of opportunity/constraint for particular types of development	Noted. Any guidance SNH can give on how to map mobile species will be welcome. Noted.

Question 16. Do you think it is important to have an overarching spatial strategy? If so, what should the strategy include and why?

Response Number*	Response Summary	Working Group Response
	<p>(e.g. the use of narrow straits for passage by vulnerable populations of marine mammals may constrain options for development of arrays of tidal turbines).</p> <p>We would also strongly support the use of a web-based GIS to provide up to date spatial information relevant to implementation of the Plan policies. This may be what is being proposed at 10.4, but we would welcome some clarification of the final sentence.</p>	<p>AP242: All the spatial data in the Draft Plan will be 'live' and updated as appropriate within the <i>National Marine Plan Interactive</i> web pages. This will be accompanied by supporting text in the Draft Plan.</p>
6 Scottish Environment Protection Agency	<p>We agree that it is important to have an overarching spatial strategy. Such an approach mirrors that recommended for terrestrial planning and as a result would result in greater integration with local development plans.</p> <p>We suggest that the strategy should identify the most appropriate location for new development, taking into consideration all the available constraint and opportunities information. Such an approach will give greater confidence to developers that developments in such areas is likely to be acceptable and hence help support sustainable economic development.</p>	<p>Noted.</p> <p>AP243: Further consultation with key stakeholders may be required to determine the best method of mapping opportunities and constraints.</p>
7 Pentland Canoe Club	<p>Yes. To ensure a co-ordinated and structured approach looking at the whole area not just a single development.</p>	<p>Noted.</p>
8 Scottish Water	<p>We would support the development of an overarching spatial strategy so as to safeguard the investments made in essential existing asset and to safeguard their function and compliance</p>	<p>Noted.</p>
9 Caithness Kayak Club	<p>I am impressed by the work that has gone into this paper, and look forward to continued liaison.</p>	<p>Noted: continued support very welcome.</p>
10 Individual	<p>The strategy has to be all encompassing. It has to be able to ask why, wherefore and therefore. It cannot just say take it or leave it. For everything it wants to do it has to be able to look at all arguments and come up with fair decisions or mitigations. The strategy is not just for the environment it is for all the people. You just have to be able to prove it.</p>	<p>Noted: the extensive consultation process, with regular updates and opportunities to comments on all the key documents produced, along with the extensive evidence base used to inform the plan making process aims to do this.</p>
12 Orkney Sustainable	<p>No comment</p>	<p>N/A</p>

Question 16. Do you think it is important to have an overarching spatial strategy? If so, what should the strategy include and why?

Response Number*	Response Summary	Working Group Response
Fisheries Ltd.		
13 Royal Yachting Association	RYAS supports an overarching spatial strategy. In the case of recreational boating, it should illustrate the main cruising routes (as provided by the RYA UK Coastal Atlas of Recreational Boating), anchorages and facilities such as marinas and harbours.	Noted. Detailed mapping of specific layers will be held on the <i>National Marine Plan Interactive</i> web pages.
14 Orkney Sea Kayak Association	No comments.	N/A
15 Kirkwall Kayak Club	No comments.	N/A
16 SportsScotland	Yes this is important. See other comments on sport and recreation – these should form part of the strategy.	Noted.
17 The Crown Estate	Yes, we believe it is important to have an overarching spatial strategy and this is what the plan should be attempting to achieve, balancing the different marine activities, sectors and interests to achieve the objectives set out in the vision.	Noted.
19 RSPB	An overarching spatial strategy is important as it can provide a coherent framework that clearly portrays the fundamental elements of the plan. Such a strategy would provide certainty to marine sectors active within the region and it would help avoid ambiguity as to the key intentions, aims and objectives of the plan. Such a strategy should present the priority economic, social and environmental considerations and policies that together support the aims of the plan and the principles of sustainable development.	Noted.
20 Highland Council	It is important to include a spatial strategy in the marine spatial plan. We agree with the aim and broad intentions for this as set out in paragraph 10.3 of the Planning Issues and Options consultation paper. The strategy can usefully raise awareness of marine uses and users in a spatial context, although it is accepted that the spatial strategy will not be so detailed – and should not be so rigid – as to be a masterplan for future development. The spatial strategy should be	Noted: we will continue to liaise with the two local authorities to ensure the marine plan is compatible with local plans and vice versa.

Question 16

Question 16. Do you think it is important to have an overarching spatial strategy? If so, what should the strategy include and why?

Response Number*	Response Summary	Working Group Response
	informed by the spatial strategies in the terrestrial plans and by that being set out in National Planning Framework 3.	
21 Scottish Renewables	<p>We support the development of an overarching spatial strategy. However, we are pleased the consultation document states it is intended to be an 'indicative high level strategy as opposed to a master plan for future development'.</p> <p>The sectoral plans indicate potential areas of development for offshore renewables, and as stated above, we believe there should be a presumption of use for renewable energy development in these areas. The sites are identified through the Iterative Plan Review process which enables the plans to be developed in light of the most up to date technical and environmental data. It is therefore essential the pilot plan is able to adapt to emerging data which will help to secure the best developments.</p> <p>Further, the sectoral plans do not prevent developers coming forward with propositions for projects out with areas identified in the sectoral plans. This flexibility must also be retained through the pilot plan.</p>	<p>Noted.</p> <p>Noted: all the spatial data in the Draft Plan will be 'live' and updated as appropriate within the <i>National Marine Plan Interactive</i> web pages. This will be accompanied by supporting text in the Draft Plan and the final Plan, which will make use of the most up to date information available. Any development will be assessed on a case-by-case basis.</p> <p>Noted.</p>
22 Scottish Wildlife Trust	Yes, yes we agree with the broad approach described in the consultation paper. Additionally a specific PFOW web based GIS tool based MSI would be a useful asset in addition to the data being available through MSI.	AP244: We will discuss the available options for displaying the various GIS layers. It may be that using <i>National Marine Plan Interactive</i> may be the most viable option to avoid duplication of effort.
23 Scottish Power Renewables	<p>Page 48, Paragraph 10.2</p> <p>It is not clear how important areas will be identified for all sectors (i.e. commercial fisheries) going out 20 years from now. There is great uncertainty looking ahead season by season; therefore, the assumptions will be so great as to potentially make the spatial information meaningless. How this is to be handles within the plan should be made clear.</p> <p>Question 16, Page 48</p> <p>[Agree it is important to have an overarching spatial strategy]</p>	<p>It is acknowledged that some aspects will be easier to map than others. Where issues are changing regularly, it may be that maps are either not provided or are updated regularly but we shall use the best information we have available. The pilot Plan will be replaced by 2 Scottish Marine Regional plans in due course i.e. one for Orkney and one for North Highland. Those plans will be updated regularly, taking new information in account.</p> <p>Noted.</p>

Question 16. Do you think it is important to have an overarching spatial strategy? If so, what should the strategy include and why?

Response Number*	Response Summary	Working Group Response
	<p>Page 48, Paragraph 10.4</p> <p>No mention is made here of fisheries data (ScotMap). This should be included.</p>	<p>The aim of the PIOP was to present proposed themes and policies therefore could not go into great detail on every aspect; this will be covered in the Draft Plan, along with the many other data sets being collected to provide a sound evidence base for the Plan.</p>
24 Orkney Renewables Energy Forum	<p>Providing 'community assets' include established fishing grounds taking account of their locational specific economic contribution to the economies of Orkney and the North of Scotland, then the issues identified in para. 10.3 and sections 11 and 12 would appear to generally encompass what should be included.</p>	<p>AP245: We may provide a specific list of community assets in the Draft Plan or may list them within the relevant sector policies, as appropriate.</p>
25 Scottish Salmon Producers Organisation	<p>Yes. See SSPO representations and objections to the Orkney Island Proposed LDP, the Highland Wide LDP, the Outer Hebrides Proposed LDP and the Argyll and Bute Proposed LDP. Also see Q10 above.</p> <p>(i) Protect marine areas suitable for salmon farming from other forms of development.</p> <p>(ii) Presumption in favour of salmon farming development in all areas other than those specifically identified as being constrained.</p>	<p>Noted.</p>
26 Orkney Trout Fishing Association	<p>Comments in Question 19 box.</p>	<p>Noted.</p>
27 Colin Kirkpatrick	<p>Comments in Question 19 box.</p>	<p>Noted.</p>
28 Carol Breckenridge	<p>Yes, the sky, the land, the space, the peace. Dunnet Head and Duncansby Head should be preserved.</p>	<p>Noted.</p>
29 Highlands and	<p>HIE consider it is important to have an overarching spatial strategy and consider it necessary to highlight the document is intended to be an 'indicative high level</p>	<p>Noted.</p>

Question 16

Question 16. Do you think it is important to have an overarching spatial strategy? If so, what should the strategy include and why?

Response Number*	Response Summary	Working Group Response
Islands Enterprise	strategy as opposed to a master plan for future development'.	
30 Dounreay Site Restoration Ltd.	Comments in Question 19 box.	Noted.
32 Scottish Fishermen's Association	<p>Giving the differences between terrestrial and oceanic planning, the description given in 10. Spatial Strategy and information describing the proposed strategy as indicative may be exaggerating the purpose and/or need for this.</p> <p>SFF would not be keen at this time to see the development of any kind of master plan, not least because of the lack of substantive knowledge of the environment being discussed.</p> <p>On the other hand the SFF can see value in having indicative information available for future use in planning.</p>	Noted.

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Question 17. Are there other crosscutting/overarching policy areas that should be addressed in the marine spatial plan?

Response Number*	Response Summary	Working Group Response
1 Marine Biopolymers	None that I can think of	Noted.
2 Pentland Firth Yacht Club	No comments.	N/A
4 Orkney Fisheries Association	No comments.	N/A
5 Scottish Natural Heritage	No comments.	N/A
6 Scottish Environment Protection Agency	We have not identified any.	Noted.
7 Pentland Canoe Club	No comments.	N/A
8 Scottish Water	Scottish Water has no comment	N/A
9 Caithness Kayak Club	No comments.	N/A
10 Individual	No comments.	N/A
12 Orkney Sustainable	No comments.	N/A

Question 17

Question 17. Are there other crosscutting/overarching policy areas that should be addressed in the marine spatial plan?

Response Number*	Response Summary	Working Group Response
Fisheries Ltd.		
13 Royal Yachting Association	Maritime and coastal safety is another cross-cutting theme involving communications, monitoring, deployment of rescue assets and provision of tugs. Marine safety appears in policy 13. However, it has wider implications beyond shipping and navigation. For example, a pollution incident could have onshore implications.	AP246: We shall add text in the cross-cutting section to cover this issue.
14 Orkney Sea Kayak Association	No comment.	N/A
15 Kirkwall Kayak Club	No comments.	N/A
16 SportsScotland	No comments.	N/A
17 The Crown Estate	We are satisfied that the proposed policies cover all key cross cutting policy areas.	Noted.
19 RSPB	No comments	N/A
20 Highland Council	Consideration should be given to having a policy in the Plan that specifically seeks high quality design and positive contributions to place-making.	Noted: place-making is a largely terrestrial environment planning concept that may be of limited value in the marine environment, but we would welcome any examples where this may be applicable.
21 Scottish Renewables	No comments.	N/A
22 Scottish Wildlife Trust	No comments.	N/A
23 Scottish Power Renewables	No comments.	N/A

Question 17. Are there other crosscutting/overarching policy areas that should be addressed in the marine spatial plan?

Response Number*	Response Summary	Working Group Response
24 Orkney Renewables Energy Forum	No comments.	N/A
25 Scottish Salmon Producers Organisation	No comments.	N/A
26 Orkney Trout Fishing Association	Comments in Question 19 box.	Noted.
27 Colin Kirkpatrick	Comments in Question 19 box.	Noted.
28 Carol Breckenridge	Aggregate extraction interfere with microclimate seabed e.g. sandeels – puffins.	Noted.
29 Highlands and Islands Enterprise	No.	N/A
30 Dounreay Site Restoration Ltd.	Comments in Question 19 box.	Noted.
32 Scottish Fishermen's Association	None.	N/A

Question 17

Question 17. Are there other crosscutting/overarching policy areas that should be addressed in the marine spatial plan?

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Question 18. Are there other sectoral policies that should be developed in the marine spatial plan?

Response Number*	Response Summary	Working Group Response
1 Marine Biopolymers	Yes – there should be a Sectoral Policy covering the Seaweed Industry in its widest context, whether that involves use of Natural Stocks, or Mariculture, which is the typical term used for seaweed cultivation. In the context of the Marine Plan, it is probably the seaweed harvesting activities that would have most relevance, and also the most interactions with other sectors	AP247: Scottish Government (SG) has just produced a draft policy document regarding commercial seaweed growing. This aspect will be added to the aquaculture policy and updated as the final SG seaweed policy becomes available.
2 Pentland Firth Yacht Club	No comments.	N/A
4 Orkney Fisheries Association	No comments.	N/A
5 Scottish Natural Heritage	Please see responses to previous questions	Noted.
6 Scottish Environment Protection Agency	We have not identified any other sectoral policies which we consider should be developed.	Noted.
7 Pentland Canoe Club	No comments.	N/A
8 Scottish Water	Scottish Water has no comment	N/A
9 Caithness Kayak Club	No comments.	N/A
10 Individual	No comments.	N/A
12	No comments.	N/A

Question 18

Question 18. Are there other sectoral policies that should be developed in the marine spatial plan?

Response Number*	Response Summary	Working Group Response
Orkney Sustainable Fisheries Ltd.		
13 Royal Yachting Association	No.	N/A
14 Orkney Sea Kayak Association	No comments.	N/A
15 Kirkwall Kayak Club	A Recreation Policy (see PPO Response Box 6).	Noted: a policy option for tourism and recreation was discussed in the PIOP and will be carried forward into the Draft Plan. AP248: Develop separate tourism and recreation policy sections.
16 SportsScotland	No comments.	N/A
17 The Crown Estate	The plan should also consider future development sectors e.g. the possible future expansion of the marine biomass industry which could deliver a sustainable and low carbon energy source but will require appropriate provision of offshore location for production and onshore locations for drying, processing and storage.	Noted: consideration will be given to this aspect when drafting the Plan but it may be outwith its scope at this stage to suggest suitable sites for a sector in its infancy.
19 RSPB	No comments.	N/A
20 Highland Council	No suggestions.	N/A
21 Scottish Renewables	No comments.	N/A
22 Scottish	No comments.	N/A

Question 18. Are there other sectoral policies that should be developed in the marine spatial plan?

Response Number*	Response Summary	Working Group Response
Wildlife Trust		
23 Scottish Power Renewables	No comments.	N/A
24 Orkney Renewables Energy Forum	No comments.	N/A
25 Scottish Salmon Producers Organisation	No comments.	N/A
26 Orkney Trout Fishing Association	Comments in Question 19 box.	Noted.
27 Colin Kirkpatrick	Comments in Question 19 box.	Noted.
28 Carol Breckenridge	No comments.	N/A
29 Highlands and Islands Enterprise	HIE do not have any other sectoral policies which should be added into the marine spatial plan.	Noted.
30 Dounreay Site Restoration Ltd.	Comments in Question 19 box.	Noted.
32	No comments.	N/A

Question 18

Question 18. Are there other sectoral policies that should be developed in the marine spatial plan?

Response Number*	Response Summary	Working Group Response
Scottish Fishermen's Association		

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Question 19. Do you have any further comments or opinions in relation to the preparation of the Draft Pilot Pentland Firth and Orkney Waters Marine Spatial Plan?

Response Number*	Response Summary	Working Group Response
1 Marine Biopolymers	None apart from saying that it should become a vital reference for all interested and impacting parties and that care needs to be taken to make sure it is maintained and adjusted as relevant in future – it needs to be a dynamic plan in that respect	Noted: the Plan will be supported by <i>National Marine Plan Interactive</i> data, which will be updated regularly. Once the pilot Plan process is completed, the subsequent individual Scottish Marine Regional plans for Orkney and for North Highland will be updated according to an agreed timetable.
2 Pentland Firth Yacht Club	We commend Marine Scotland on its open approach and the depth and effort of its consultation process. The language style and documents are quite heavy going and time consuming for private individuals. The PFYC generally supports the careful and thoughtful exploitation and development of the region providing this is done with all interests being equally considered. We believe that reasonable compromises are acceptable for overall societal benefit.	Noted and support welcome; it is worth nothing that these documents are being produced in collaboration with Orkney Islands Council and Highland Council. AP249: We shall consult with our Advisory Group and stakeholders on the best way to make the Draft Plan as succinct but relevant to as many people as possible.
4 Orkney Fisheries Association	No comments	N/A
5 Scottish Natural Heritage	No further comments.	N/A
6 Scottish Environment Protection Agency	None at this stage, expect that we are happy to provide further advice and guidance in relation to our interests.	Noted: support welcome.
7 Pentland Canoe Club	No comments.	N/A
8 Scottish Water	Scottish Water's primary functions are the production and distribution of potable drinking water and the collection, management, treatment and safe return to the environment of domestic, trade effluent and surface water drainage. Maintaining the integrity of our sewerage network, outfalls and pipelines discharging to the	AP250: These aspects will be considered when drafting the Plan.

Question 19. Do you have any further comments or opinions in relation to the preparation of the Draft Pilot Pentland Firth and Orkney Waters Marine Spatial Plan?

Response Number*	Response Summary	Working Group Response
	sea is vital in providing this essential service for the people of Scotland. In the interests of public health any statutory framework must take into account and balance the legitimate needs of all users of the marine environment including the water industry requirement to discharge treated effluent. Scottish Water's coastal (shoreline) and marine infrastructure assets are static and must remain operational 24hrs a day.	
9 Caithness Kayak Club	No comments.	N/A
10 Individual	No comments.	N/A
12 Orkney Sustainable Fisheries Ltd.	No comments.	N/A
13 Royal Yachting Association	No.	N/A
14 Orkney Sea Kayak Association	No comment.	N/A
15 Kirkwall Kayak Club	We recognise that this consultation is of a strong planning and policy nature and therefore contains a lot of specialist terminology, however we would welcome future consultation papers on user-specific areas to be written in a more user-friendly style.	AP251: We shall consult with our Advisory Group and stakeholders on the best way to make the Draft Plan as succinct but relevant to as many people as possible.
16 SportsScotland	No comments.	N/A
17 The Crown Estate	No further comments.	N/A
19 RSPB	The Draft Plan is of a very high quality and is both legible and concise, clearly setting out the key policy and legislative drivers behind development of the plan.	Noted: comments and support welcome but note that the PIOP is not a draft of the plan; that will be the next

Question 19. Do you have any further comments or opinions in relation to the preparation of the Draft Pilot Pentland Firth and Orkney Waters Marine Spatial Plan?

Response Number*	Response Summary	Working Group Response
	<p>Furthermore the emphasis on sustainable development and the importance of these underpinning principles that are presented throughout the plan are welcomed and supported.</p> <p>We hope to be engaged in further stages of the plan preparation process and look forward to seeing the proposed plan and its policies.</p>	stage.
20 Highland Council	<p>Subject to any comments provided elsewhere in this response, The Highland Council is supportive of the stated 'preferred option' in respect of each of the proposed policies.</p> <p>The Highland Council welcomes being part of the Working Group that is developing the Plan and has made significant commitment to this in terms of officer time. We look forward to continuing involvement in the Working Group and continuing engagement of the wide variety of Council interests as the development of the pilot marine spatial plan is taken forward. The Plan has potential to be a very useful document to help further sustainable economic development in North Highland. We are particularly keen to ensure that marine and terrestrial planning are appropriately integrated and aligned and would welcome further discussion on how that may be achieved.</p>	Noted: comments and support welcome.
21 Scottish Renewables	No comments.	N/A
22 Scottish Wildlife Trust	The overall approach is warmly welcomed and the planning issues and options paper is well considered document clearly demonstrating the benefits of multidisciplinary partnership working between Marine Scotland and Highland and Orkney Councils. We look forward to further consultation on the pilot plan.	Noted: comments welcome.
23 Scottish Power Renewables	<p>Introduction, Page 5, Paragraph 1.2</p> <p>Mention is given to the Marine Energy Park; however it is not explained how this designation fits into the current consultation on the PFOW MSP. Clarity should be given as to this and also how this might affect future marine renewables developments.</p>	<p>AP252: The Draft Plan will provide additional detail on the status of the Marine Energy Park (MEP). All the key players involved in the MEP are part of our consultation database.</p>

Question 19. Do you have any further comments or opinions in relation to the preparation of the Draft Pilot Pentland Firth and Orkney Waters Marine Spatial Plan?

Response Number*	Response Summary	Working Group Response
	<p>Figure 4, Page 19</p> <p>No representation is made in this figure of the Sectoral Plans for wind, wave & tidal or the current consultation on the MPA coherent network.</p> <p>Page 24, Paragraph 6.8</p> <p>Mention is made of the plan being used in the determination of marine licensing applications – it is assumed that this includes Section 36 applications as well as applications for a Marine Licence? It may be better to be specific here.</p> <p>Within this section called “The status of the pilot marine spatial plan” it may be opportune to set out exactly where it is likely to fit in the bigger picture and how it is likely to relate to all the other plans either currently being consulted on (i.e. the NMP) or likely to come out in the foreseeable future.</p> <p>Page 24, Paragraph 6.9</p> <p>This paragraph is contradictory in nature stating initially that the proposed pilot plan will be a material consideration in any consent application determination. However, the latter part of the paragraph then goes onto state that the plan is non-statutory in nature and will only act as guidance. Paragraph 6.10 then goes onto describe that it is the Regional Marine Plans that are statutory in nature.</p> <p>Page 87, Paragraph 13.2</p> <p>We welcome the acceptance that the plan will have to be reviewed and updated. This is not currently clear in the consultation, but we look forward to this being addressed within the monitoring and reviewing framework within the final consultation document.</p>	<p>AP253: The left graphic on the left hand side of the figure shows the RLG for the sectoral marine plans: this will be updated if required. However, it is likely that new graphics will be required in the Draft Plan to update the information now published on a range of SG documents which were not available at the time of writing the PIOP.</p> <p>AP254: The Draft Plan will provide greater detail on the how the Plan will be used and its status.</p> <p>This information is provided in Figure 3 and will updated as appropriate.</p> <p>The pilot plan will be both a material consideration and guidance; these are not mutually exclusive. As this is a pilot process for regional marine planning, the pilot plan will be non-statutory and be used to inform the process of developing the 11 Scottish Marine Regional Plans, which will be statutory.</p> <p>Noted.</p>
24	No further comments.	N/A

Question 19. Do you have any further comments or opinions in relation to the preparation of the Draft Pilot Pentland Firth and Orkney Waters Marine Spatial Plan?

Response Number*	Response Summary	Working Group Response
Orkney Renewables Energy Forum		
25 Scottish Salmon Producers Organisation	No comments.	N/A
26 Orkney Trout Fishing Association	<p>Orkney Trout Fishing Association (OTFA) attended the Marine Spatial Plan workshop held jointly between OIC, Marine Scotland and ICIT in early July in the King Street Halls in Kirkwall. We'd like to reiterate and add the following points :</p> <p>1) In relation to Aquaculture we believe that Marine Scotland need to decide on a safe distance between salmon cages and sea trout spawning burns. Everybody (excepting some industry bodies apparently) now accept that there is a serious risk to wild salmonids from the artificially high levels of sea lice frequently found distributed on salmon farms. The massively disproportionate levels of this otherwise naturally occurring parasite, emanating from salmon farms, quite simply devastates unwitting wild fish populations. No amount of management or medicinal procedure can safely mitigate for this threat with increasing evidence of lice having evolved resistance to treatments such as Slice. Recently MS advised OIC in relation to sea based salmon farms and with regard to a proposed new aquaculture development (Cava South), that new sites should be at least 14 km away from wild salmonid spawning burns. A point that was either ignored or misinterpreted, as the development went ahead.</p> <p>2)With respect to the above point there really needs to be a situation where siting and relocation of all current salmon farms is reviewed with regard to their proximity to, and influence on, wild sea trout spawning burns. Much new research and acceptance of the controversial link has emerged since most of these initial licenses were granted.</p>	<p>Noted.</p> <p>The Plan will not replace existing statutory requirements for aquaculture planning but will ensure that the aquaculture policy is in line with existing legislative requirements.</p> <p>It is outwith the scope of the pilot marine plan to undertake such action; most aquaculture sites have been granted or are in the process of being granted, permanent planning permission either as part of the Scottish Government audit and review process or the local authority planning process.</p>

Question 19. Do you have any further comments or opinions in relation to the preparation of the Draft Pilot Pentland Firth and Orkney Waters Marine Spatial Plan?

Response Number*	Response Summary	Working Group Response
	<p>3) OTFA have done a massive amount of voluntary electro-fishing and survey work to provide the local authority with information allowing the mapping of all known local sea trout spawning burns. That provides an excellent premise to avoid future conflict with wild fish populations when it comes to marine spatial planning and proposed new salmon farms. A situation so far side stepped by the powers that be.</p> <p>4) Orkney Trout Fishing Association are a one hundred year old, 500 member voluntary organisation who cherish and fight for the free access, effectively community owned, wild trout fishery which is almost unique in this nation. Many more local people enjoy that resource without being members. Free and responsible trout angling is engrained in our increasingly unique Orcadian identity, and therefore wherever psychological “well being” can be added to the list of criteria considerations in the document it should be. This was repeatedly mentioned at our table on the workshop day. It obviously also relates to cultural heritage, but increasingly I know of people who have given up on their previous, often massive personal volunteer effort to try and protect our wild fishery from a sea of new development proposals, often from foreign owned companies providing foreign markets with what is effectively unsustainably produced salmon. This is a sad reflection on a much changed planning system that increasingly seems to exist solely to suit new political ends. It used to be considered our human right to fish for an easily sustainable wild fish and now lots of people are giving up because of damaged and lost populations of sea trout to badly located salmon farms. This does have a psychological effect on ones sense of well being and “quality of life”.</p> <p>5) Another concern raised at our table at the workshop was that the voluntary sector is suffering from consultation fatigue and the constant barrage of lengthy and increasingly complex consultation documents. There is also a feeling that responses that go against current political will are routinely ignored and side stepped, to the point that it was generally agreed that the larger community in Orkney are totally disillusioned and disengaged with the whole concept of</p>	<p>AP255: Noted: we shall use the data to help shape the Draft Plan.</p> <p>Noted.</p> <p>AP256: A Quality of Life / Well Being policy section will be developed in the Draft Plan.</p> <p>Whilst recognising there are many public consultations in the area, we have a duty to consult and do value local opinion. We also have a duty to conform to Scottish Government policy to support the local economy, thus supporting the viability of local communities.</p>

Question 19. Do you have any further comments or opinions in relation to the preparation of the Draft Pilot Pentland Firth and Orkney Waters Marine Spatial Plan?

Response Number*	Response Summary	Working Group Response
	<p>consultation. Similarly the increasingly rare members of the general public who have to find the time to do this are constantly up against an army of financially interested professionals only interested in “economic growth” or some other political agenda.</p> <p>6) In an official survey carried out a few years ago, angling tourism was valued at £1.7 million per annum and is a valued part of Orkney’s existing and eminently sustainable portfolio of economic resources. This resource, because it already exists and provides valuable income to a whole range of businesses, needs to be protected when any proposed new developments – increasingly carrying the ominous attachment of “being in the greater national interest” - are put on the table.</p> <p>7) In relation to the above, I have found that visiting anglers hold our cultural heritage and Orcadian “character” in high esteem as well as naturally associating the word “Orkney” with a relatively pristine and not overly developed land and seascape. It currently enjoys a fine balance of agricultural and wild land as well as partially developed sheltered coastline and large areas of beautiful and undeveloped coast – often epitomising the word “wild”. A massive and increasingly vulnerable asset.</p> <p>8) Orkney Trout Fishing Association (OTFA), in the absence of any local Fisheries Trust or Rivers Board, are widely accepted as being the local organisation with a responsibility to, and active interest in, wild salmonids.</p> <p>We want nothing more than a truly sustainable <i>and</i> responsible aquaculture industry that is willing to coexist with an increasingly rare, historically important and eminently sustainable wild sea trout population.</p>	<p>AP257: It would be helpful if any data held by OTFA could be supplied to help shape the Draft Plan. As the Plan will bring together information on all the main sectors currently or proposing to use marine resources it will highlight existing users and the balance required between new and existing activity.</p> <p>AP258: Any coastal designations of wild land will be mapped in the Draft Plan or the supporting National Marine Plan Interactive.</p> <p>Noted.</p> <p>Noted.</p>
27 Colin Kirkpatrick	<p>I attended the recent Marine Spatial Plan workshop in Kirkwall and would like to add the following points.</p> <p>1) It was generally agreed at our table that everyone is suffering from</p>	<p>Whilst recognising there are many public consultations</p>

Question 19. Do you have any further comments or opinions in relation to the preparation of the Draft Pilot Pentland Firth and Orkney Waters Marine Spatial Plan?

Response Number*	Response Summary	Working Group Response
	<p>consultation fatigue, especially the few people who have to engage voluntarily on behalf of community organisations and local groups. We also came to the conclusion that there was a complete mistrust locally after repeated local consultations had effectively ignored many well known concerns. I notice a new raft of consultations are currently out with regard to marine and country planning and there is a feeling that they exist not to protect our land and seascape any more but to allow politically motivated, big business growth in previously “no go” areas.</p> <p>2) What is considered to be justifiable when it comes to allowing development in previously undeveloped and wild areas of coastline seems to now rest on phrases like “in the national interest” and again this seems to put a national political agenda in higher priority than local cultural concerns. This needs to be addressed especially with regard to Orkney’s unique cultural identity where we are Orcadian first and Scottish only second. Along with Shetland, Orkney is the least “Scottish” of all the island groups therefore we also have our own version of “national interest” it being “Orcadian interest” !</p> <p>3) In respect to the above Cultural identity and what it means to be Orcadian is informed by where you were brought up and what you associate with being Orcadian. I have a part time career as a contemporary visual artist and am heavily involved in Orkney’s cultural sector. I completely associate Orkneys wild western coastline with my identity as an islander and would hate to see - as yet - unproven technology strewn it’s length and breadth as is already proposed. The Crown Estate famously set a bad precedent, and presumption for development to go ahead, by leasing these vast areas of sea without effectively engaging the local community in any way that I can find. Therefore I feel very strongly that cultural identity, quality of life and general well being need to be considered separately and wherever possible within the document.</p> <p>4) To many local artists and Orkney’s largely unrepresented creative sector the undeveloped western coastline of the mainland of Orkney epitomises a unique creative cultural heritage in particular. In it’s undeveloped state it has been an</p>	<p>in the area, we have a duty to consult and do value local opinion. We also have a duty to conform to SG policy to support the local economy, thus supporting the viability of local communities.</p> <p>Noted: however, this Plan will also cover north Caithness and Sutherland therefore a balance is required between these areas.</p> <p>AP259: We shall ensure that cultural identity, quality of life and general well being of Orcadians, along with the people of north Caithness and Sutherland, are given due consideration in the Draft Plan, with an aim to have these issues embedded within a well-being and quality of life policy section.</p> <p>AP260: As part of a the evidence gathering for this Plan process, we shall be undertaking a tourism and recreation case study to identify the key assets to</p>

Question 19. Do you have any further comments or opinions in relation to the preparation of the Draft Pilot Pentland Firth and Orkney Waters Marine Spatial Plan?

Response Number*	Response Summary	Working Group Response
	<p>inspiration to generations of globally recognised writers and internationally exhibited artists. All these people have to make a living and it is therefore an existing economic resource, crucially in it's current "undeveloped" state. This sort of creative economy remains a great model of true sustainable development in an island community. In the same sense tourism and it's huge influence on the Orkney economy relies on visitors wanting to come to experience this place. Time and again I am informed by visitors to Orkney (that actually spend more than a day here) that one of the main reasons for coming here is their expectation and desire to see unspoiled "island" views and nature in the "wild" which is something they are not disappointed by. Again this is part of an existing economic resource which is eminently sustainable for future generations. Therefore it needs to be quantified and properly assessed in it's current state as to it's future importance to a truly long term sustainable Orkney.</p> <p>5) Orkney currently, despite the recession, has one of the lowest unemployment figures in the country. Do we really want to see 4000 new jobs in Orkney by developing Marine Energy to it's biggest projected conclusion as has recently been claimed. That would mean, along with employees partners and family's, a population increase of nearly a third !! What effect would that have on our quality of life, well being and the Orkney identity ? Socio economic assessment has to look at the negative as well as the nationally perceived positive.</p> <p>6) I hold (value) my environment and culture in the highest regard : it makes me who I am. Recent public surveys have found Orcadians and Sheltlanders to be some of the happiest people in the country. This is no accident – we do enjoy a fine balance between development and nature at the moment. This could easily be destroyed. So- called future large scale economic growth shall not necessarily benefit Orkney in the long term. However I am confident that Orkney shall survive and continue to thrive if none of this development goes ahead. Can any consultant prove otherwise ?</p>	<p>ensure they are given due consideration within the Draft Plan.</p> <p>Noted.</p> <p>AP261: A Quality of Life / Well Being policy section will be developed in the Draft Plan.</p> <p>Noted.</p>
28 Carol Breckenridge	No comments.	N/A

Question 19. Do you have any further comments or opinions in relation to the preparation of the Draft Pilot Pentland Firth and Orkney Waters Marine Spatial Plan?

Response Number*	Response Summary	Working Group Response
29 Highlands and Islands Enterprise	No.	N/A
30 Dounreay Site Restoration Ltd.	<p>On behalf of DSRL, I would like to submit the response below to the Pilot Pentland Firth and Orkney Waters Marine Spatial Plan.</p> <p>The Dounreay nuclear site is currently being decommissioned to its “interim end state” – the point when all the redundant buildings have been cleaned out and demolished and the radioactive waste made safe for long-term storage or disposal. The aim is to achieve the interim end state by 2025. As part of our decommissioning programme we work closely with agencies to minimise the effect of the decommissioning activities to the local economy. Therefore the proposed plan is welcomed as it will assist in developing the local economy.</p> <p>I would draw your attention to our activities associated with the clean-up of the marine environment around the Dounreay site, details of which can be found at www.dounreay.com/particle-cleanup. We would encourage anyone considering a development in the area adjacent to our site to contact us to discuss how this could be undertaken and ensuring any conflicts are appropriately managed.</p>	<p>Noted: support welcome.</p> <p>AP262: We shall look at the information provided to see how we can use it to shape the Draft Plan.</p>
32 Scottish Fishermen’s Association	No comments.	N/A

*Responses number 3 and 31 were in relation to the draft Environmental Report and are not included here. Response number 11 cannot be made public as a Respondent Information Form was not received and number 18 was from an individual that did not give permission to make their response public.

Section 11. Crosscutting or overarching marine planning policies.

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Response Number*	Response Summary	Working Group Response
1 Marine Biopolymers	All policies – I am in agreement with the Preferred Option proposed for all Policies	Noted.
2 Pentland Firth Yacht Club	<p>Policy 1a The criterion should include the benefit from the exploitation i.e. not just for revenue purposes and why there are not other better locations</p> <p>Policy 3c: As long as bio-diversity does not means upsetting the natural balance by allowing new species to develop or existing species to dominate compare to pre-exploitation.</p> <p><i>Alternative:</i> May need to have staged development with monitoring over sufficient period.</p>	<p>AP263: The Sustainable Development policy section will be drafted to ensure the economic benefits of existing economic activity, added value and new development proposals are assessed. Consideration will also be given to developing a policy to assess economic impacts.</p> <p>These issues relating to biodiversity are addressed in the proposed natural heritage policies including the non-native species policy, nature conservation designations and the wider biodiversity and geodiversity, as well as the Environmental Report and the Habitats Regulations Assessment.</p> <p>Noted. Monitoring will be addressed in the monitoring section of the Draft Plan.</p>
4 Orkney Fisheries Association	No comments.	N/A
5 Scottish Natural Heritage	<p>General (cross-cutting and sectoral policies)</p> <p>We consider the policy topics identified to be appropriate to this Plan, but would have welcomed further development of additional and more detailed policy options. For some policies (e.g. Commercial Fisheries) the alternatives suggested for presentation of spatial information do not appear to be real alternatives.</p>	<p>Agreed the alternative set out for Commercial fisheries is not a clear alternative. The responses to this consultation will inform the selection and development of an appropriate policy for Commercial Fisheries.</p> <p>AP264: Amendments will be made to the individual matrix topics and these will be represented in the</p>

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	<p>Within the Plan, two-way cross-referencing between policies (both across and within overarching and sectoral policies) as well as reference to the guiding principles will be important to ensuring its overall coherence. A summary schematic in the Plan introduction could be helpful to assisting users to identify policies of key relevance to their particular interests.</p> <p>We feel that the proposed range of crosscutting policy areas is appropriate to this marine plan, but suggest that Marine Safety (which is currently included in sectoral policy 13) might be considered an overarching policy area. We would also suggest that dredging be moved from sectoral policy 16 (Marine Aggregates) to sectoral policy 14 (Ports and harbours) as the main dredging activity is capital and maintenance dredging, and associated dredge spoil disposal, associated with ports and harbours. Dredging for any future aggregate extraction would by definition be about permanent removal of material from the seabed/intertidal zone. The Plan should also be cross-referenced to relevant policies in Orkney and Highland LDPs with respect to commercial extraction of sand.</p> <p>We offer comments below on those cross-cutting policies (1a, 2a, 3a-e, 6a) of direct relevance to our core remit.</p> <p><i>Alternative:</i> Not relevant</p> <p>Proposed Policy 1a: Sustainable Development</p> <p>Please see response to Q8. We broadly support the preferred option but feel that a policy around sustainable development will require use of very precise and consistent terminology. For example, at places in 11.2 and 11.3 there is</p>	<p>appropriate sections but the whole matrix will not be reproduced. As many interactions can have both positive and negative effects, these effects will not be weighted but the key issues will be discussed in the supporting text.</p> <p>AP265: Consideration of Marine Safety issues will be developed in the marine transport policy section.</p> <p>It should be noted that sector specific marine safety and emergency response issues will also be addressed within the sectoral policies as appropriate.</p> <p>AP266: A separate policy will be developed for Dredging and Disposal, and Marine Aggregates.</p> <p>AP267: Cross reference to relevant minerals policies within appropriate local development plans.</p> <p>Noted.</p> <p>N/A</p> <p>AP268: Provide a clear definition of sustainable development in the Draft Plan.</p>

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	<p>reference to “sustainable economic growth” but it is not clear how this relates to “sustainable development”. We suggest that last bullet of preferred option be amended to “make efficient use of marine space and <i>sustainable use</i> of natural resources <i>within their carrying capacity</i>”. We also note that there is no explicit consideration of the socioeconomic conditions of coastal communities within the proposed policy.</p> <p><i>Alternative: See comments above</i></p> <p>Proposed Policy 2a: Integrating marine and coastal development</p> <p>We regard this as a very important policy area, particularly with respect to management of cumulative impacts of marine-related developments within the coastal zone. We support the preferred option; our concerns are over how this will be implemented in compliance with this Plan’s overarching principles (please refer to our response to Q6)</p> <p><i>Alternative: See comments above</i></p> <p>Policy Area 3: Biodiversity and Natural Heritage Proposed Policy 3a: Nature conservation designations Proposed Policy 3b: Protected species Proposed Policy 3c: Wider biodiversity and geodiversity interests Proposed Policy 3d: Non-native species</p> <p>We feel that this suite of proposed policies is necessary and appropriate to provide safeguard of key aspects of the natural heritage of PFOW. However, as currently presented the focus of these policies, particularly 3a, and 3b, is on the assessment and consenting of development. We would advocate inclusion of a clear policy at the outset to articulate the importance, and need for safeguard, of the area’s natural heritage; this would create a strong baseline</p>	<p>AP269: The Sustainable Development policy section will be drafted to ensure the economic benefits of existing economic activity, added value and new development proposals are assessed. Consideration will also be given to developing a policy to assess economic impacts.</p> <p>AP270: Include a requirement to consider cumulative impacts within the integrating coastal and marine development policy.</p> <p>AP271: A ‘Safeguarding the natural environment’ general policy will be prepared within the Draft Plan to provide a mechanism for protecting marine ecosystems and the wider natural environment. This policy will provide the overarching context from which more specific policies on development management would</p>

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	<p>from which more specific policies on development management would then follow.</p> <p><i>Proposed Policy 3a: Nature conservation designations</i> We are broadly content with the proposed preferred option, but offer the following comments.</p> <p>Context (section 11.12): note that Ramsar sites are not Natura 2000 sites and that there is no specific legal framework in Scotland for their safeguard. However, all Ramsar sites in Scotland are also either Special Protection Areas (SPAs) or Special Areas of Conservation (SACs) and benefit from the measures required to protect and enhance these Natura sites and SSSIs which overlap them.</p> <p>Context (section 11.13: the description of the status GCR sites is incorrect. GCR sites. Please see http://www.snh.gov.uk/protecting-scotlands-nature/safeguarding-geodiversity/protecting/geological-conservation/ for description of GCR sites and SSSIs with geological and geomorphological features.</p> <p>Policy: in addition to mapping of designated sites within the Plan area, consideration will need to be given about how to provide information on potential connectivity to Natura sites outwith the area (as referenced in section 11.12) and to potential future designations (e.g. MPA proposals and areas of search for marine SPAs). The development of this policy (and other, including sector policies) should also be informed by the Habitats Regulations Appraisal of the Plan itself.</p> <p>Proposed Policy 3b: Protected species</p> <p>We are broadly content with the proposed preferred option, but feel that there</p>	<p>then follow.</p> <p>Noted.</p> <p>Noted.</p> <p>AP272: Note this reference and use to inform the preparation of the nature conservation policy(s) in the Draft Plan.</p> <p>AP273: Set out the process for identifying potential connectivity issues in relation to mobile features of Natura sites out with the plan area within the supporting text to the nature conservation policy(s) in the Draft Plan.</p> <p>AP274: Liaise with SNH to identify appropriate spatial</p>

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	<p>are opportunities to provide Plan users with spatial information on the occurrence of protected species (e.g. locations of seal haul out sites) as well as providing guidance on where information may be found. Please refer to our response to Q16.</p> <p>Proposed Policy 3c: Wider biodiversity and geodiversity interests</p> <p>We suggest that the biodiversity duties under the Nature Conservation (Scotland) Act 2004 are referenced in the context to this policy. We support the general aspiration of the proposed preferred option but are unable to comment further pending further detail as to the definition of “due regard” within the wording of the draft policy.</p> <p>The alternatives for presentation of spatial information are not entirely clear; we would welcome opportunities for further discussion of this aspect (see also Q16).</p> <p>Proposed Policy 3d: Non-native species</p> <p>We strongly support the inclusion of a policy on invasive non-native species (INNS) (please also see response to Q14) and the recognition of the particular importance of prevention of introductions in the marine environment. However, as with policy 3c, we are unable to comment further pending further detail on the wording of the proposed draft policy, but note that it needs to be cross-referenced to the Ports and Harbours and Oil and Gas policies within this Plan and to other relevant documents (e.g. Orkney Islands Council’s developing ballast water management plan). With respect to spatial data, we note that present occurrence of NNS within the Plan area provides context, but is of limited direct relevance to addressing risk of further introductions from elsewhere.</p>	<p>and non-spatial data relating to protected species and how this data should be presented i.e. with the plan or within supporting web-based GIS.</p> <p>AP275: Reference the biodiversity duties under the Nature Conservation (Scotland) in the context to the nature conservation policy(s) in the Draft Plan.</p> <p>AP276: Liaise with SNH to identify appropriate spatial and non-spatial data relating to the wider biodiversity and geodiversity policy in the Draft Plan.</p> <p>Support for INNS policy noted.</p> <p>AP277: Cross reference INNS policy section to the Ports and Harbours and Oil and Gas policy sections within this Plan and Orkney Islands Council’s developing ballast water management plan.</p> <p>Comments relating to spatial data have been noted.</p>

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	<p>Proposed Policy 3e: Landscape and seascape</p> <p>We strongly support the inclusion of specific policies for the management of change in the distinctive landscape and coastal character of the Orkney Islands and north Caithness coast.</p> <p>However, as stated with respect to policies 3a and 3b, we would welcome inclusion of a clear policy with respect to the importance and protection where necessary of the coastal and seascape resource; this would provide a strong baseline against which policies on the assessment of development management would then follow.</p> <p>Any assessment of development should be underpinned by a clear and robust assessment of landscape and seascape character. The SNH Orkney Landscape Character Assessment (http://www.snh.gov.uk/publications-data-and-research/publications/search-the-catalogue/publication-detail/?id=299) assesses the landscape character of the Orkney Archipelago and could be used as a basis to include additional work on the coastal and seascape character of the PFOW area, in particular the landscape and visual relationship between the coast and the immediate seascape. Following on from this an assessment of sensitivity and/or capacity for different forms of development could be undertaken to inform the proposed policies on development management. In this context, an initial scoping contract has been recently been let by SNH to develop a methodology for coastal characterisation; we would be interested in exploring with you the potential for this to be further developed and incorporated into the Stage 2 Research Studies informing the preparation of this Plan.</p> <p>Any such Research Study should draw upon the assessment of Special Qualities of the Hoy and West Mainland NSA and the SNH Mapping of Relative Wildness. Both the recent work undertaken by Orkney Islands Council on</p>	<p>Support noted.</p> <p>AP278: Consider the importance of protecting coastal landscape and seascape resources with the Draft Plan objectives.</p> <p>AP279: Liaise with SNH to consider how the existing landscape character assessment and coastal characterisation methodology can inform the Draft Plan.</p> <p>Noted.</p>

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	<p>assessment and identification of a suit of Local Landscape designations, the majority of which are coastal, and the equivalent work by The Highland Council assessing Special Landscape Areas, should be incorporated.</p> <p><i>Alternative: See comments above</i></p> <p>Proposed Policy 6a: Coastal erosion and flooding</p> <p>We strongly support the inclusion of specific policies for the management of coastal erosion and coastal flooding around the Orkney Islands and north Caithness coast.</p> <p>Climate change projections suggest that future rates of sea level rise in this part of Scotland, may (in the coming decades) approach rates not experienced for several thousand years. This is expected to increase the risk of erosion and flooding on some sections of the coast. Although much of the coastline is resilient, there are areas vulnerable to either erosion, flooding or, in some cases, the effects of both. Given the variability of the coastline, we recommend the initial use of regional mapping of flooding (see SEPA's indicative flood maps) and erosion susceptibility (see SEPA/SNH Coastal Erosion Susceptibility Model). Follow-up, more detailed assessment could be undertaken if required. Given the largely un-interfered / natural state of much of the soft shoreline, the use of adaptive strategies may prove most sustainable. On the developed defended sections more interventionist approaches may prove more attractive.</p> <p>For information, SNH overarching policy on coastal erosion states: As far as is possible within the constraints of public safety, SNH advocates approaches to erosion management which retain the natural coastal habitats, processes and landscapes and which enable Scotland's coastlines to evolve naturally with minimal human intervention.</p>	<p>Noted.</p> <p>Support noted.</p> <p>Noted.</p> <p>AP280: Use regional mapping of flooding (SEPA's indicative flood maps) and erosion susceptibility (SEPA/SNH Coastal Erosion Susceptibility Model) to inform the development of the coastal processes and flooding policy in the Draft Plan.</p> <p>Noted.</p>

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	<i>Alternative: As above</i>	Noted.
<p>6 Scottish Environment Protection Agency</p>	<p>Proposed Policies 1A, 2A, 3A, B, C and D and 7A</p> <p>In relation to our interests we can confirm that we support the preferred options.</p> <p>In relation to Proposed Policy 3D we remind you that consideration of introduction of marine non native species via attachment to construction plant, as well as in ballast water, needs to be considered.</p> <p><i>Alternatives: No.</i></p> <p>Policy Area 5 and Proposed Policy 5A: Water Environment</p> <p>We support the preferred option. It is especially important to us that the water environment is protected and that opportunity for improvements and enhancements are taken where ever possible.</p> <p><i>Alternatives: No.</i></p> <p>Policy 6A: Coastal Erosion and Flooding</p> <p>We are supportive of a policy approach which supports assessment of development for flood risk and ensures that it does not add to existing problems or introduce new problems. In line with the Flood Risk Management Act, opportunities for reducing existing flood problems should be identified as well.</p> <p><i>Alternatives: Covered above.</i></p>	<p>Noted.</p> <p>AP281: Text will be drafted accordingly.</p> <p>Noted.</p> <p>AP282: Use regional mapping of flooding (SEPA's indicative flood maps) and erosion susceptibility (SEPA/SNH Coastal Erosion Susceptibility Model) to inform the development of the coastal processes and flooding policy in the Draft Plan.</p>
<p>7 Pentland Canoe Club</p>	<p>Tourism & Recreation</p> <p>Please ensure that recreation guide books (eg guide books for sea kayaking and surfing) are consulted so that there is an understanding of the established /</p>	<p>AP283: Use the guide book information to inform the PFOW Tourism and Recreation case study.</p>

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	<p>recognised routes or surfing areas. There are currently 2 guide books for sea kayaking in the area and a 3rd is about to be published. It is important to contact local organisations (eg clubs) who will have more detailed information of areas used.</p> <p>The preferred option should consider where marine development consent could bring benefits to tourism and recreation.</p> <p>Protected Species</p> <p>The preferred option should provide an overview of potentially sensitive known locations of individual species and also guidance of where further information can be obtained.</p> <p>Landscape & Seascape</p> <p>It is important that the visual impacts of developments are considered and in particular the cumulative impacts. The impacts should also the visual and noise impacts during installation and operation & maintenance.</p> <p>Waste management and Marine Litter</p> <p>The policy should also safe guard the water from increase pollution from “rubbish” discarded /lost from vessels as a result of increased activity.</p>	<p>Noted.</p> <p>Noted. Designated sites, such as Natura and MPAs, will be provided as live map layers in National Marine Plan Interactive.</p> <p>AP284: Impacts on biodiversity, as covered in the Environmental Report and HRA, consider cumulative impacts and these will be reflected in the Draft Plan.</p>
8 Scottish Water	<p>3b Protected Species</p> <p>We would wish to see this policy should be developed at a National rather than at a Regional level, applying a scientific and evidence based approach, thus ensuring that certain mobile or migratory species would have appropriate levels of protection wherever they exist and leading to certainty for developers to manage risks, determine investment requirements and manage their activities.</p> <p><i>Alternative: Scottish Water has no comment</i></p>	<p>Noted. We have a duty to consider this at regional as well as national level. The policies and supporting text will support national policy, using scientific and evidence based approach, as shown by the numerous supporting studies and vast evidenced gathering approach taken to date.</p>

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	<p>3c Wider biodiversity and geodiversity interests</p> <p>Scottish Water works with our environmental regulators to ensure that an appropriate level of protection for natural heritage designated sites and protected species and habitats is integrated into our capital and operational expenditure projects.</p> <p><i>Alternative:</i> Scottish Water has no comment</p> <p>3d Non-native species</p> <p>We support the preferred option; threats, issues and management specific to marine Non-Native Species (NNS) occurring locally need to be addressed, we would seek to protect our assets integrity and functionality.</p> <p><i>Alternative:</i> Scottish Water has no comment</p> <p>5a Water environment</p> <p>With regard to paragraph 11.49</p> <p>Scottish Water invests in WWTW and collecting systems to meet regulatory drivers based on a number of criteria, including the population within a network catchment and sensitivity and status of the receiving waters for the final effluent or discharge. It is essential that all sectors that may be contributing to diffuse pollution of marine waters either directly, or indirectly via rivers, are managed and regulated in an unbiased way.</p> <p>With regard to paragraph 11.50</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted.</p>

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	<p>Scottish Water understands that SEPA takes the view that the current category of “Recreational and Shoreline Waters” has no legal basis and that this terminology is no longer used.</p> <p>With regard to paragraph 11.51</p> <p>We would wish to point out that “larger” discharges from WWTW do not necessarily present a greater impact or risk to the environment , I refer to the response to paragraph 11.49 above.</p> <p>Preferred option</p> <p>We would wish to be consulted further if programmes of measures were considered necessary to implement the provisions to safeguard bathing water quality at designated bathing beaches.</p> <p><i>Alternative:</i> Scottish Water has no comment</p> <p>7a Waste management and marine litter</p> <p>Scottish Water is actively participating in the development of the marine litter strategy</p> <p><i>Alternative:</i> Scottish Water has no comment</p> <p>8a Safeguarding existing pipelines, electricity and telecommunications cables</p> <p>Scottish Water considers that final effluent discharge pipelines and Combined Sewer & Emergency Overflows (CSO & EO) should be included in the policy to safeguard existing pipelines; we support the proposal to identify appropriate</p>	<p>Noted.</p> <p>AP285: we shall consult with SEPA to ensure use of appropriate terms.</p> <p>Noted.</p> <p>Noted. This would be appropriate at individual project development level.</p> <p>Noted.</p> <p>AP286: Policy and text to be drafted accordingly in the Draft Plan.</p>

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	<p>interests of Orkney that these ties be developed and kept safe for the future. The wrecks are corroding away and in the long term there will be nothing left. It should be left to OIC to determine the various controls and how these can be tied in with other areas of historic interest such as the Lyness Museum in order to create permanency. This, of course, would exclude war graves.</p> <p>Preferred Options Item 2 It should be remembered that “safe havens” are called this because they are safe havens and should be available for anchoring under all conditions of weather and tide. Their ease of entry should not be obstructed in any form.</p> <p>Policy Area 5: Water Environment</p> <p>There are various areas within Scapa Flow where consent has been given for fish farms. It is noticeable that on calm days pollution can be seen stretching a considerable distance from the cages. Dinghy sailing, which includes the training of children, regattas, canoeing and other activities takes place in many parts of Scapa Flow. In some of these activities there is always the risk of capsize which comes as part of the training. If the water is polluted there is always the risk to health especially with children.</p> <p>Is ballast discharge from tankers considered as being large scale?</p> <p>Policy Area 7: Waste Management and Marine Litter</p> <p>For quite a few years now I have been involved in beach cleaning in the Houton and Coldomo areas. In every year we have been collecting between 100 and 50 bags of litter, although the first year at Coldomo it was 150. These clean ups can really be regarded as partial ones as after every tide there is more showing as the seaweed is turned over and the sand and gravel moved.</p>	<p>will continue to support conservation of important sites where possible: the MSP will not supersede existing legislation or terrestrial LA policy. OIC and HC will continue to work closely with Historic Scotland and other relevant agencies to ensure the cultural and historic environment are safeguarded in the PFW area.</p> <p>Noted.</p> <p>Discharges are regulated by SEPA: the MSP will not supersede existing legislation or terrestrial Local Authority policy but the Water and Aquaculture policies and supporting text will help ensure development is sustainable thereby taking appropriate environmental issues into consideration. This will be dealt with in the non-native invasive species section (Policy 3D in the PIOP): the discharges referred to here related to those licenced by SEPA.</p> <p>Noted: this information is most helpful.</p> <p>AP287: By having a marine litter policy, linked to the new proposed SG marine litter strategy, we shall draft out policy to look at amendments to existing</p>

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Fisheries Ltd.		
13 Royal Yachting Association	<p>2A Integrating marine and coastal development</p> <p>It is difficult to see how there can be good integration between the two planning regimes unless the Pilot Marine Spatial Plan is a material consideration in the LDPs and vice versa. Three examples where integrated marine and coastal developments are already taking place are: Hatston jetty extension, the Golden Wharf at Lyness and Copland's Dock in Stromness. All of these are associated with the shore facilities required by marine renewable developments.</p> <p><i>Alternatives:</i> No.</p> <p>Proposed policy option 3D: Non-native species</p> <p>A considerable amount of work has been carried out on developing the existing policy on Invasive Non-Native Species. The RYA (the UK Governing Body for Recreational Boating) has been working with the statutory agencies on this for some time. It is important that there is a consistency of approach throughout all UK waters. The Firth of Clyde Forum has developed a biosecurity plan for the Clyde which draws upon much of the established policy.</p> <p><i>Alternatives:</i> The Pilot Marine Spatial Plan should not attempt to develop a new policy on INNS but rather refer to existing guidelines and policy taking account of any factors that are particular to the PFOW area.</p> <p>Proposed policy option 5: Water Environment</p> <p>We welcome the statement in section 11.50 about identified recreational and shoreline waters that have potential to be affected by discharges to the water environment. Dinghy sailing, regattas, canoeing and other activities take place in many parts of Scapa Flow. In these activities there is the risk of immersion. If</p>	<p>It is intended that the Pilot Marine Spatial Plan will be identified as supplementary guidance within the coastal policy within the relevant LDPs.</p> <p>Noted.</p> <p>Discharges are regulated by SEPA: the MSP will not supersede existing legislation or terrestrial Local Authority policy but the Water and Aquaculture policies and supporting text will help ensure development is</p>

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	<p>the water is polluted there will be a risk to health especially with children. We presume that finfish aquaculture will be included as a possible source of pollution.</p> <p><i>Alternatives:</i> No.</p> <p>Proposed policy option 7A: Waste management and marine litter</p> <p>Marine litter is also a hazard to small vessels if, for example, a polythene bag is sucked into a cooling intake, discarded rope becomes wrapped round a propeller, or floating debris damages a vessel’s hull. While reduction at source is the prime consideration, there also need to be appropriate facilities for recycling or otherwise disposing of unavoidable wastes. This policy focuses on new developments. However, the plan also needs to take account of existing sources of litter. Data from beach cleans provides valuable information on the origins of litter although these are unable to assess micro-particles and micro-fibres of plastic. In the Houton and Coldomo beach cleans, about 40% of the litter consists of plastics in the form of bags, containers and sheets most apparently coming from farms.</p> <p>Another 40% may be considered as being marine litter in that it consists of ropes, old and new, bits of fishing nets and some complete nets. The most likely source for these items is fish farm boats, fishing boats and ferries. As most of the litter appears in the winter months recreational boats are unlikely to be a significant source. The final 20% comes from the dumping of building waste, wire and barbed wire, old tyres and wheels plus a myriad of other things. The Spatial Plan will need to be consistent with the Scottish Marine Litter Strategy but the emphasis may well differ due to the different relative sources of the litter.</p> <p><i>Alternatives:</i> No.</p>	<p>sustainable thereby taking appropriate environmental issues into consideration.</p> <p>Noted: this information is most helpful.</p> <p>AP288: By having a marine litter policy, linked to the new proposed SG marine litter strategy, we shall draft out policy to look at amendments to existing development, rather than just new development, where appropriate.</p>

Section 11. Crosscutting or overarching marine planning policies.

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	<p>Proposed policy option 9A: Hazardous developments and HSE consultation zones.</p> <p>The position of existing hazardous installations also needs to be mapped. For example, the Flotta pipeline shut off valve is situated in South Ronaldsay by the 4th barrier.</p> <p><i>Alternatives:</i> No.</p>	<p>Detailed maps will be prepared for the Draft Plan and be made available through the National Marine Plan Interactive.</p>
14 Orkney Sea Kayak Association	No comments.	N/A
15 Kirkwall Kayak Club	No comments.	N/A
16 SportsScotland	<p>PP 2a Integrating marine and coastal development</p> <p>It would be useful to understand whether the plan has a locus outwith the statutory planning, licencing and consenting regime to look at areas such as positive management of the marine zone. So this would include policy that relates to areas such as byelaw development or codes of conduct or positive management through e.g. zoning, management agreements, guidance, signposting, communication, information etc. These are mechanisms relevant to positive ICZM and it would be useful to know how this will be taken forward under marine planning.</p> <p>PP 3a,b,c,d – Natural heritage.</p> <p>We hope that such a comprehensive approach is taken to the protection and consideration of sport and recreation interests.</p>	<p>It is beyond the scope of the pilot plan process at this stage, but something that may be taken forward by the subsequent Regional Marine Plans in due course.</p> <p>Noted.</p>

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	<p>PP 3e Landscape</p> <p>It will be important to take cognisance of SNH’s core wild land area mapping which is being used by NPF3 to protect wild land areas. The marine development impact on these core areas should be considered.</p> <p>In considering landscape it is important, in addition to considering aesthetic components, to also be aware of the physical qualities of the landscape that are used for a range of recreational activities. This needs thought on how it relates to the marine environment but if the intention is for policy to extend to the land then consideration should be given to whether landscape policy intends to provide protection to landscape qualities such as gradient, bedrock, water table etc. which all determine what activities take place where and at what level. From a seascape perspective this could include impacts on wave pattern and height, sediment shift, current patters etc that are integral to seascape and to recreational use of the seascape.</p> <p>PP5a – water environment</p> <p>Water quality is fundamental to participation in immersion sports. We fully support the need to maintain and improve water quality.</p> <p>PP 6a – erosion and flooding</p> <p>We support the need to assess the impact development could have on flooding and erosion. Please see answer to question 6.</p>	<p>This will be mapped in the National Marine Plan Interactive where there is a marine/coastal element.</p> <p>Noted.</p> <p>Noted.</p> <p>We are working closely with OIC and HC planners, as well as SEPA, to ensure that our Plan is compatible with terrestrial Local Plans and vice versa.</p>
17 The Crown	Proposed Policy 1a: Sustainable Development	

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Estate	<p>Given the purpose of the plan is defined as to “<i>support the sustainable development of key sectors including, but not limited to, offshore renewables, aquaculture, inshore fisheries, tourism and recreation</i>”, it is important that a robust policy on sustainable development is defined and developed within the plan.</p> <p>We support the proposed option to set out a high level policy that details the considerations that need to be addressed to achieve sustainable development in relation to all development proposals. In order for this to assist decision-making bodies/regulators in considering whether sustainable development principles have informed the preparation of development proposals, it is important that such a policy demonstrates consistency with the National Marine Plan.</p> <p>The proposed policy states that that development will be supported where it:</p> <ul style="list-style-type: none"> • Safeguards or enhances the natural, cultural and historic environment • Demonstrates compatibility with other marine users • Supports the sustainable use of existing infrastructure • Makes efficient use of marine space and natural resources. <p>We would also like to see the following points considered for inclusion:</p> <ul style="list-style-type: none"> • Supports the growth and diversification of the local economy • Makes a contribution towards meeting Scotland’s climate change targets. <p>Proposed Policy 2a: Integrating marine and coastal development</p> <p>We welcome the proposed approach to develop policies which support the integrated consideration of marine and terrestrial planning issues. The integration of marine and terrestrial planning issues will be particularly relevant to the terrestrial elements of offshore renewable energy developments.</p>	<p>Noted.</p> <p>AP289: This will be a key policy section, with a clear definition and supporting text.</p> <p>Now that a draft NMP is available, we shall ensure our Draft Plan aligns with it.</p> <p>AP290: We shall consider these points when drafting the Plan.</p> <p>AP291: Climate change will be a policy area within the Draft Plan.</p> <p>Noted.</p>

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	<p>Therefore, we support the reference to the forthcoming Scottish Government circular on this topic. It will be important that the policies developed within the plan are consistent with this circular.</p> <p>In addition to the Circular, the recent consultation on the Main Issues Report of the National Planning Framework 3¹ proposes that the onshore infrastructure requirements for offshore renewable energy are considered as a National Development. Given the status of National Developments in establishing the need for that development, it is important that the plan reflects the designation of onshore infrastructure requirements for marine energy developments in any policies on integrating marine and coastal development.</p> <p>We also suggest that the plan should be a material consideration in the determination of marine licence applications and in the determination of terrestrial planning applications which are linked to offshore development e.g. marine renewables.</p> <p>¹ Scottish Government (2013) Scotland's Third National Planning Framework: Main Issues Report and Draft Framework (2013) http://www.scotland.gov.uk/Resource/0042/00421073.pdf</p> <p>Proposed Policy 3a: Nature conservation designations</p> <p>We support the proposal to develop a policy in the plan that sets out the criteria for assessing the effects of development proposals, individually and cumulatively, on identified nature conservation sites. It is important that such a policy is consistent with other policy and plans such as the National Marine Plan.</p> <p>The policy will seek to address issues in relation to connectivity between nature</p>	<p>The Pilot Marine Spatial Plan will be a material consideration in the determination of marine licence applications and terrestrial planning applications. It is intended that the Pilot Marine Spatial Plan will be identified as supplementary guidance within the coastal policy of the relevant LDPs.</p> <p>Noted.</p> <p>Noted. Whilst we agree that connectivity issues will be</p>

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	<p>conservation sites and proposed developments. However, we would suggest that in many cases, this would be more effectively done at a project level.</p> <p>Proposed Policy 3b: Protected species</p> <p>We support the proposed approach for the plan to identify the legal requirements for protected species that must be addressed in the assessment of applications for development consent as required under European, UK and Scottish Legislation. This should also include any species covered by the forthcoming designation of Marine Protected Areas (MPAs).</p> <p>Proposed Policy 3c: Wider biodiversity and geodiversity interests</p> <p>No comment.</p> <p>Proposed Policy 3d: Non-native species</p> <p>No comment.</p> <p>Proposed Policy 3e: Landscape and seascape</p> <p>We support the proposal for the plan to contain a policy to guide the assessment of development proposals affecting landscape designations and support the assessment of potential impacts on wider landscape / seascape character. We would also welcome a clear definition of what is meant by seascape where this is referenced in a plan, consistent with other marine planning documents where possible.</p> <p>Proposed Policy 4a: Cultural and Historic Environment</p> <p>We support the proposed approach and suggest that reference is also made to</p>	<p>dealt with at individual project level, to help ensure cumulative impacts of multiple activities are highlighted, we shall provide guidance at the regional scale.</p> <p>Noted.</p> <p>Noted.</p> <p>AP292: Provide definition of 'seascape'.</p> <p>Noted.</p>

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	<p>the 'Protocol for reporting finds of archaeological interest'² developed by Wessex Archaeology for The Crown Estate. The Protocol applies to pre-construction and construction activities associated with the development of offshore renewable energy schemes where an archaeologist is not present on site. It sets out a framework for ensuring finds discovered on the seafloor, on a vessel, in intertidal zones, and on land are reported to ensure that the submerged cultural heritage is understood and protected accordingly.</p> <p>² Wessex Archaeology (2010) Protocol for reporting finds of archaeological interest http://www.wessexarch.co.uk/projects/marine/tcerenewables/protocol</p> <p>Proposed Policy 5a: Water environment</p> <p>No comment.</p> <p>Proposed Policy 6a: Coastal erosion and flooding</p> <p>No comment.</p> <p>Proposed Policy 7a: Waste management and marine litter</p> <p>No comment.</p> <p>Proposed Policy 8a: Safeguarding existing pipelines, electricity and telecommunications cables</p> <p>We support the proposed policy to safeguard pipelines and cables for potentially damaging activities and applying appropriate safety zones to protect these assets. In general, opportunities for sustainable development should be</p>	<p>We are exploring the most appropriate ways of providing links to the large array of documents that have been used to draft the Plan.</p> <p>AP293: Consider document suggested when drafting the Plan.</p> <p>Noted.</p>

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	<p>progressed in a way which does not unnecessarily compromise existing interests.</p> <p>The Crown Estate recently commissioned a desktop study which identified, reviewed and assessed the factors affecting the routing and spacing of transmission cables for offshore wind farms. The findings, conclusions and recommendations from the study form the basis of our report and are available to download from our website: http://www.thecrownestate.co.uk/energy-infrastructure/cables-and-pipelines/studies-and-guidance/cable-routing-and-spacing-study/.</p> <p>Although the project specifically related to offshore wind, many of the principles and technical issues discussed in the report are relevant to other forms of offshore renewable energy generation. This work is a good example of how interactions between adjacent activities can be considered.</p> <p>Proposed Policy 9a: Hazardous development and Health and Safety Executive consultation zones</p> <p>No comment.</p> <p>Proposed Policy 10a: Defence</p> <p>We would support the provision of as much information as is possible regarding MoD activities to inform areas of appropriate future development.</p> <p>Question 17: Are there other crosscutting / overarching policy areas that should be addressed in the marine spatial plan?</p> <p>We are satisfied that the proposed policies cover all key cross cutting policy areas.</p>	<p>Noted.</p> <p>AP294: Consider documents suggested when drafting the Plan.</p> <p>Noted.</p> <p>Noted.</p>

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19 RSPB	No comments.	N/A
20 Highland Council	<p>Proposed Policy 1a: Sustainable Development</p> <p>The preferred option is broadly supported but requires amendment. Firstly the policy should explicitly support sustainable development. Secondly the policy should include, in the policy tests, criteria relating to the contribution of development to social objectives and to economic objectives (the criteria, as proposed, already including environmental tests). The Council's view is that these additional criteria should be within the same policy rather than in separate policy; sustainable development includes all three considerations.</p> <p><i>Alternatives:</i> No</p> <p>Proposed Policy 2a: Integrating marine and coastal development</p> <p>As well as referring to the Highland-wide Local Development Plan, there should also be reference to the forthcoming Caithness and Sutherland Local Development Plan (and in the interim, reference should be made to the Caithness Local Plan and Sutherland Local Plan, each as currently continued in force).</p> <p>There will be some challenges presented by the relative timelines for preparation of various plans. The Caithness and Sutherland Local Development Plan (CaSPlan) is not expected to be in place until after the Pilot Marine Spatial Plan; however, the Highland-wide LDP is already in place, providing some strategic context and there will be opportunity in preparing CaSPlan to ensure that it refers to and integrates with the Pilot MSP. Having marine spatial planning and terrestrial spatial planning actively occurring in the area will enable us to have focussed discussions about opportunities for integration and on potential areas of interaction (and potential resolution of any conflict).</p>	<p>Noted.</p> <p>AP295: The policy and supporting text will be drafted taking these comments into consideration.</p> <p>Noted.</p> <p>The working group is working closely with the two local authorities to ensure close liaison with terrestrial plans.</p>

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	<p>The preferred option identifies that there is potential for the pilot marine spatial plan to become a material consideration in the determination of planning applications. We would support that approach. We will also consider adopting the pilot marine spatial plan as statutory Supplementary Guidance in so far as it relates to areas covered by the Council's Development Plan and subject to the inclusion of suitable cross-reference and policy 'hook' within the forthcoming Caithness and Sutherland Local Development Plan.</p> <p><i>Alternatives:</i> No</p> <p>Proposed Policy 3e: Landscape and seascape</p> <p>We agree with the preferred option. It would be useful if, in association with this, a set of key viewpoints could be established which would be used for purposes of visualisations for individual developments and to maintain a representation of the cumulative effect of multiple proposals.</p> <p>However, if the possible alternative is pursued further, care must be taken to ensure that the potential research study outlined would add value. If it is undertaken then as far as possible use should be made of existing studies and assessments, including those with a terrestrial focus but which could be relevant in considering impacts of development in the marine area on the wider landscape, and cumulative impacts. Recent experience with offshore wind proposals in the Moray Firth and current work by Marine Scotland on sectoral plans could also help inform this.</p> <p><i>Alternatives:</i> No</p> <p>Proposed Policy 4a: Cultural and Historic Environment</p>	<p>As the marine plan covers many different types of development over a wide range of sea ad coastal habitats, it is unfeasible to provide the visualisations suggested. However, this may be an aspect that could be developed in the individual Regional Marine Plans.</p>

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	<p>Where the policy and supporting text refer to “unprotected marine and coastal archaeology”, this should be amended to read “non-designated marine and coastal archaeology”.</p> <p>There would be scope to reduce the length of this section of the plan, by not listing each individual feature type in both policy and supporting text but in just one location and/or placing some detail in an appendix, as in the Highland-wide Local Development Plan (Policy 57 and Appendix 2).</p> <p><i>Alternatives:</i> No</p> <p>Proposed Policy 10a: Defence</p> <p>It is suggested that the proposed policy test for development proposals should relate to fit with “established Ministry of Defence activities”, rather than “Ministry of Defence activities” which could be overly constraining on development.</p> <p>We note that the proposed Plan area, extending westwards along the Sutherland coast to Cape Wrath, will assist in taking into consideration as part of the Plan the defence uses in that area.</p> <p><i>Alternatives:</i> No</p>	<p>AP296: The policy and supporting text will be drafted taking these comments into consideration.</p> <p>AP297: The policy and supporting text will be drafted taking these comments into consideration.</p> <p>AP298: The policy and supporting text will be drafted taking these comments into consideration.</p>
21 Scottish Renewables	<p>Sustainable Development:</p> <p>We support a principle of sustainable development. However, the established principles of sustainable development should be referenced.</p> <ul style="list-style-type: none"> • Living within environment limits • Ensuring a strong, healthy and just society • Achieving a sustainable economy • Using sound science responsibly 	<p>Noted.</p> <p>AP299: This policy and/or supporting text will be updated to ensure it conforms to the principles of sustainable development.</p>

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	<ul style="list-style-type: none"> Promoting good governance <p>Integrating Marine and Coastal Development:</p> <p>Please refer to our answer to question 6 above.</p> <p>Nature Conservation Designations:</p> <p>The legal requirements developers must adhere to in relation to nature conservation designations are understood and developed at a national level. It is not appropriate for the pilot plan to develop separate policies in this regard. The policy must be consistent with national level guidance and legislative requirements.</p> <p>The policy option set out for protected species should also apply in relation to protected sites and we question why they are proposed to be treated differently. The policy in relation to protected species sets out to identify legal requirements and identify the protected species which will likely be encountered in the area. The protected areas in the PFOW should be identified and the legal requirements in relation to those sites should be made clear.</p> <p>Wider Biodiversity and Geodiversity Interests:</p> <p>We support using the pilot plan to focus the development of further research.</p> <p>Cultural and Historic Environment:</p> <p>As stated above, developing guidance in relation to best practice and marine</p>	<p>We are working closely with OIC and HC planners to ensure that our Plan is compatible with terrestrial Local Plans and vice versa.</p> <p>The Draft Plan must take designated sites into consideration. All policies and supporting text will be consistent with national level guidance and legislative requirements. The Draft Plan will provide non-statutory regional guidance and support for sustainable marine development, taking environmental considerations into account. It is a pilot process as a pre-cursor to the Regional Marine Plans.</p> <p>The Nature Conservation Designations is the main process by which key biodiverse habitats are protected; both habitats (i.e. sites) and species are covered by proposed policies 3A-3D, and address the appropriate separate legal requirements.</p> <p>Noted.</p>

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	<p>renewables should be referred to.</p> <p>Safeguarding Existing Pipelines, Electricity and Telecommunications Cables:</p> <p>Exclusion zones should already apply around electricity cables to help secure safety of both the cables and other marine users. The plan should not seek to alter those requirements or designations, however, there may be a role for the plan to further develop plans for enforcing existing legislation.</p>	<p>Noted. The Draft Plan will not alter existing exclusion zone designations. The Draft Plan will provide non-statutory regional guidance and support for sustainable marine development, taking environmental considerations into account. It is a pilot process as a pre-cursor to the Regional Marine Plans.</p>
<p>22 Scottish Wildlife Trust</p>	<p>1. Sustainable Development</p> <p>We warmly welcome the intention to include a crosscutting policy on sustainable development. However the consultation paper uses the term sustainable economic growth where sustainable development would be the expected term. That said we agree with the preferred option as stated, although would like to see it reflect the 5 guiding principles of sustainable development outlined in the UK SD strategy.</p> <p>3B Protected Species</p> <p>We would support the alternative supporting spatial information of broadly mapping the locations of protected species. Although we understand that species recording effort in the PFOW is not evenly distributed, there are areas that can be identified as important for cetaceans (e.g. Scapa Flow, Gills Bay, Dunnet Bay) and could be usefully identified in the spatial plan.</p>	<p>Noted.</p> <p>AP300: This policy and/or supporting text will be updated to ensure it conforms to the principles of sustainable development.</p> <p>Noted. Where reliable data exist, these will be mapped.</p>
<p>23 Scottish Power Renewables</p>	<p>Proposed Policy 1A [Sustainable Development]</p> <p>Page 49, Paragraph 11.3</p>	

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	<p>Mention is made here of marine renewables; however no mention is made of offshore wind. The upcoming sectoral plans show offshore wind within the PFOW MSP area and should, therefore, be taken into account. This is an example of the requirement for an upfront description of how all future plans are to be considered by the PFOW MSP.</p> <p>Additionally, it is stated here that certain sectors (e.g. recreation and tourism) are established. However, this does not allow for the inclusion of „new“ activities which may well be brought forward in these established sectors. Any potentially „new“ activities need to also be captured within the plan given that it is proposed to be looking 20 years hence.</p> <p>Page 50</p> <p>The statement „<i>Safeguards or enhances the natural, cultural and historic environment</i>“ is likely to be very difficult to achieve and/or assess for any sort of development and or increase in activity.</p> <p>Proposed Policy 3A [Nature Conservation Designations]</p> <p>The preferred option here will seek to address connectivity issues between conservation sites and proposed developments. It is not clear how this will be achieved given the 20 year outlook of the plan. Will this be species specific, will it take the sectoral plans for wind, wave and tidal into account, will it consider the currently propose coherent network of nature conservation MPAs? There are still a lot of questions that need addressed given that a lot of consultation is yet to take place.</p> <p>Page 55, Paragraph 11.20</p>	<p>AP301: Offshore wind is a part of marine renewables: further clarity will be given in the Draft Plan.</p> <p>The aim of the PIOP was to provide some ideas for the key issues that should be covered when undertaking the first draft of the plan. Section 11.2 suggests that sustainable development should be a key theme i.e. it does not limit development to any single sector. The Draft Plan will make it clearer that all sustainable development will be supported, providing it meets the relevant policy criteria.</p> <p>Noted.</p> <p>The aim of the PIOP was to provide some ideas for the key issues that should be covered when undertaking the first draft of the plan.</p>

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	<p>It is unclear as to the role of the PFOW MSP in the identification of habitats and species as it is stated here that the knowledge and the data are piecemeal. This may ultimately be misleading and full of assumptions.</p> <p>Page 57, Paragraph 11.24 [Proposed Policy 3D: Non native species]</p> <p>The IMO Biofouling Guidelines are stated here as being voluntary. Should it be the role of the PFOW MSP and/or the RMPs to ensure that these guidelines are formally adopted by all recreational craft organisations that utilise the area?</p> <p>[Proposed Policy 4A: Cultural and Historic Environment]</p> <p>Page 61, Paragraph 11.44</p> <p>Clarity should be given as to how the consideration of unprotected sites will be taken into account. For example, will it consider them to be protected?</p> <p>Page 65, Proposed Policy 5A [Water Environment]</p> <p>Much of the supporting spatial information set out here alters annually. Clarity is required as to how this is to be dealt with in the PFOW MSP given its 20 year outlook.</p> <p>Page 67, Proposed Policy 7A [Waste Management and Marine Litter]</p> <p>This section appears to limit the consideration of waste plans to developments; however, these should be considered by all sectors including commercial fisheries and recreational activities.</p>	<p>National Marine Plan Interactive will provide the most up to date information available as data layers which are regularly updated. The Draft Plan is a starting point in that it brings information on many different sectors, interests and activities together in one place and considers opportunities for synergies and mitigation.</p> <p>Noted.</p> <p>AP302: This information will be considered when drafting the Plan.</p> <p>Noted. National Marine Plan Interactive will provide the most up to date information available as data layers which are regularly updated.</p> <p>Noted.</p> <p>AP303: Take these comments into account when drafting the Plan.</p>

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	<p>Page 69, Proposed Policy 9A [Hazardous Development and HSE Consultation Zones]</p> <p>This section appears to focus on developments. However, there should be awareness that all new activities within any sector will have implications with regards this policy area and should be considered.</p>	<p>Noted.</p> <p>AP304: Take these comments into account when drafting the Plan; a definition of ‘developments’ will be provided.</p>
<p>24 Orkney Renewables Energy Forum</p>	<p>(Note: Typo in policy 1a ‘with’ should be ‘should’ in the opening sentence)</p> <p>1a</p> <p>‘Safeguards or enhances’ is a relatively new planning term that has been broadly adopted, but it is very subjective. Every development has various impacts and some of these impacts will be negative, so to say that it must ‘safeguard or enhance’ unnecessarily stacks the case against development proceeding. The terminology should take account of the balance of impacts i.e. an assessment that the benefits of proceeding with any development outweigh the negatives that would be endured by allowing it to proceed.</p> <p>2a</p> <p>See answers to question 5 & 6.</p> <p>3a</p> <p>The wording of the preferred policy option stacks the case against development insofar as those utilising the deploy and monitor approach would no doubt give rise to significant objections from natural heritage bodies with regard to the cumulative assessments required for all developments proposed in the plan</p>	<p>Noted.</p> <p>Noted.</p> <p>AP305: This policy and/or supporting text will be updated to ensure it conforms to the principles of sustainable development.</p> <p>Noted.</p> <p>Noted.</p> <p>AP306: Take these comments into account when drafting the Plan.</p>

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	<p>area. Clear boundaries need to be set regarding to what extent cumulative impacts should be considered. Without these being defined in the policy document , the wording risks giving carte blanche to the natural heritage consultees to require cumulative assessments of all development proposals throughout the whole spatial plan area to be made for each and every development proposal submission.</p> <p>3b, 3c & 3d</p> <p>No comments to make.</p> <p>3e</p> <p>A study should be carried out to ensure that assessment is made from the same basis. Having only subjective policies in this area will result in the same undesirable situation that has arisen for on-shore wind developments with regards to the assessment of landscape impacts.</p> <p>4a</p> <p>Apart from the WHS designation around Skara Brae, the vast majority of the text concerning the Heart of Neolithic Orkney WHS is completely irrelevant. The central west mainland area of the WHS is not visible from any of Orkney's coast - there is no need to cite any of the monuments in the central west mainland within the policy as having any remote chance of being affected by off-shore elements of proposed marine renewables development. The WHS, comprising Maeshowe and the standing stones/ Ring of Brodgar, is designated for its monuments situated in a 'natural amphitheatre' which comprises a backdrop of</p>	<p>Noted.</p> <p>AP307: We shall liaise with SNH to ensure we use the best available guidance.</p> <p>Noted.</p>

Section 11. Crosscutting or overarching marine planning policies.

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	<p>a circle of hills.</p> <p>Assessments would obviously be required for impacts on Skara Brae, coastal listed buildings etc but this policy needs fairly substantial redrafting.</p> <p>5a</p> <p>No comments</p> <p>6a</p> <p>No comments</p> <p>7a</p> <p>No comments other than marine litter is already governed by other legislation so may not be required to be covered by the MSP.</p> <p>8a</p> <p>No comments.</p> <p>9a</p> <p>No comments</p> <p>10a</p> <p>No comments</p>	<p>The Draft Plan is not replacing any existing legislation; it will provide non-statutory regional guidance and support for sustainable marine development, taking environmental considerations into account. It is a pilot process as a pre-cursor to the Regional Marine Plans.</p>
25 Scottish Salmon	Policy 2A. See Q6 above.	Noted.

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Producers Organisation		
26 Orkney Trout Fishing Association	Comments in Question 19 box.	Noted.
27 Colin Kirkpatrick	Comments in Question 19 box.	Noted.
28 Carol Breckenridge	<p>1a [Sustainable Development]</p> <p>It is not new tourist attraction but preservation of unique wild land and cultural heritage which is vital</p> <p><i>Alternative:</i> Limited development and more research preferred option</p> <p>3a [Nature Conservation Designations]</p> <p>Dunnet Head from Brough should be designated SSSI to protect it.</p> <p>3a and 3b [Nature Conservation Designations] and [Protected Species]</p> <p>Dunnet Head and Duncansby Head and road from Brough – should be designated SSSIs.</p> <p>[3e Landscape and Seascape]</p> <p>Seascape and landscape. N.E. coast is vital and should not be changed.</p> <p><i>Alternative:</i> Dunnet Head and Duncansby Head preserved for future generations. No sustainable development.</p>	<p>Noted.</p> <p>Noted but beyond the scope of the PFOW MSP process.</p>

Section 11. Crosscutting or overarching marine planning policies.

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	<p><i>Comments not attributed to specific policy:</i></p> <p>Preferred and proposed [?? No policy stated]</p> <p>More attention to Neolithic sites in Caithness.</p> <p>Caithness to be considered equally important as Orkney and equal attention to archaeology.</p>	<p>Noted.</p> <p>AP308: Ensure Caithness & Sutherland sites given due consideration.</p>
<p>29 Highlands and Islands Enterprise</p>	<p>1a Sustainable Development</p> <p>HIE urges Marine Scotland to adopt the preferred option. We would welcome further information around how this policy will be crafted and how it will become a sustainable development policy which fits with Stakeholders policies which are currently in place.</p> <p><i>Alternative:</i> The alternative approach – do nothing which is not an option, this is a necessary component of the overall policy.</p> <p>4a Cultural and Historic Environment</p> <p>HIE urge Marine Scotland to develop guidance in relation to what is already out in the marketplace with the inclusion of marine renewables clearly stating what the legal requirements are.</p>	<p>Noted. HIE are part of the Advisory Group, which assists with the Plan drafting process.</p> <p>Noted.</p> <p>AP309: Take these comments into account when drafting the Plan.</p>
<p>30 Dounreay Site Restoration Ltd.</p>	<p>Comments in Question 19 box.</p>	<p>Noted.</p>
<p>32 Scottish Fishermen's</p>	<p>Proposed Policy 8a: Safeguarding existing pipelines, electricity and telecommunications cables.</p>	

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Association	National level guidelines already exist for both developing and protecting cables, (electrical or telecoms) and pipelines. Any Regional Marine Plan would need to take these into consideration. <i>Alternative:</i> The wholesale application of safety zones to these structures would be both unnecessary and burdensome to the catching sector, better to work with established systems such as FISHSafe and Kingfisher.	Noted.

*Responses number 3 and 31 were in relation to the draft Environmental Report and are not included here. Response number 11 cannot be made public as a Respondent Information Form was not received and number 18 was from an individual that did not give permission to make their response public.

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1 Marine Biopolymers	I have no comments re these Policies – the Preferred Options suggested for each all look to be eminently sensible.	Noted.
2 Pentland Firth Yacht Club	<p>Policy 12: Also needs to include environmental effects of noise / electrical fields from power cables.</p> <p>Policy 13: Safe navigation for small vessels and sailing vessels needs special attention in fast tidal waters. Closing some channels and using alternative routes may increase risk if more exposed. Both construction and O&M need to be considered.</p> <p>[Policy 14] Ports and Harbours: Policy needs to include the impact on all harbour users including leisure and tourism. Need to make sure lower income users are not squeezed out in preference for commercial use.</p>	<p>AP310: The marine renewable energy policy and electricity infrastructure policy should address noise and disturbance issues and the assessment of potential effects electro-magnetic fields (EMF).</p> <p>AP311: The operation and safety of shipping and navigation policy, or the supporting text, should highlight the need to assess potential impacts of development and activities (e.g. O&M) on small vessels through Navigational Risk Assessments.</p> <p>AP312: The ports and harbours policy should address the needs of growth economic sectors, recreational, leisure, tourism and community users.</p>
4 Orkney Fisheries Association	<p>19: Commercial Fisheries</p> <p>Section 12.30 suggests that the value of landings into Wick and Orkney in 2012 were £18 billion. We are unsure where this figure came from. The Scottish Government's landing statistics for 2011 put landings for Orkney at £7,580,000 and Scrabster (Wick is not within the plan area anyway) at £32,281,000.</p> <p>Value of landings and employment figures should also have been provided in Section 12.31 to highlight the fishing industry's economic importance. Furthermore, mention should also have been made of the Orkney Fishermen's Society and its role in adding value to fishery products.</p>	<p>Noted. The reference to £18 billion was a typing error.</p> <p>AP313: Include landings value, employment figures and added value in either the Commercial Fisheries or contextual/introductory section of the Draft Plan, where appropriate.</p>

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	<p>We welcome the proposed approach towards presumption against development in spawning and nursery grounds. This would be required for the plan to be consistent with an ecosystem approach.</p> <p><i>Alternative:</i> We recommend fisheries policies similar to those expressed in the Shetland Marine Spatial Plan:</p> <p>Safeguarding Fishing Opportunities</p> <p>All relevant organisations and stakeholders to work with the local fishing community to safeguard future sustainability of the industry and their stocks. Development proposals will not normally be permitted if they obstruct an important fishing ground. An important fishing ground will be defined by the frequency of use, productivity or community dependence of an area, which has been determined by local fishermen.</p> <p>Local management of Sustainable Fisheries</p> <p>Fishermen designed local fisheries management will develop appropriate measures so that fishing is not carried out in ways that damage important habitats and species.</p>	<p>Support noted.</p> <p>AP314: Review Shetland Marine Spatial Plan Policy MSP FISH 1 <i>Safeguarding Fishing Opportunities</i> and to take cognisance of this policy in the drafting of appropriate policy(s) within the Draft Plan.</p> <p>AP315: Consider frequency of use, productivity or community dependence of an area in the drafting of Commercial Fisheries policy(s) within the Draft Plan.</p> <p>Noted.</p>
5 Scottish Natural Heritage	<p>Proposed Policy 11: Marine renewable energy</p> <p>We support the development of offshore renewables as set out in our Marine Renewables Energy Policy statement 04/01 Policy Guidance Note. We recognise the importance that the Pentland Firth and Orkney Waters has with regard to the development of the new marine renewable energy sector. We welcome the development of the Sectoral Plans for offshore wind, wave and</p>	<p>Noted.</p>

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	<p>tidal and would recommend that these sectoral plans provide the basis for the recognition of sites suitable for offshore energy in the future, within this marine spatial plan framework.</p> <p>We consider the option to set out the material planning considerations for the assessment of applications is appropriate, but we would also recommend that there is a commitment to review any policy on a frequent basis in the early stages of the development of these industries. This will enable good practice and lessons to be learned to be conveyed and communicated to all interested parties in a coherent and timely manner. It should be noted that, in setting out this policy, consideration should be given to the potential for cumulative and in combination effects between and within the marine renewables sector and other interests; this will be of relevance in particular for any suggestions for mitigation.</p> <p><i>Alternative:</i> We would not support zoning <i>per se</i> as an alternative approach (p. 73). However, the MSP may wish to review the option areas identified within the Sectoral plans for offshore wave, tidal and wind energy developments against the other sectoral interests considered in the Plan and identify where there may be issues of compatibility and or competition. This, along with the (preferred) policy approach of setting out what aspects will be considered as a material planning consideration, may assist developers seeking to identify suitable sites for offshore renewables in the future.</p> <p>Proposed Policy 12: Electricity infrastructure to support marine renewable energy projects</p> <p>We support the preferred approach set out in Proposed Policy 12. However, given the similarity of potential impacts on the natural heritage, and other sectors, we recommend that this be combined with policy 18 on development</p>	<p>Noted. It is intended that an adaptive management approach will be set out for the monitoring and review of PFOW MSP. As this is a pilot plan, developed to inform the future regional marine plans for the area, it is likely that the next opportunity for the review policies, and potentially adaption of existing or development of new policies, will be through the drafting of the future statutory regional marine plans for Orkney and for North Coast.</p> <p>Noted. The identification of existing use including other sectoral interests will be presented within each of the sectoral sections of the Draft Plan. The Marine Renewable Energy policy will highlight how relevant existing use data, potential constraints and sensitivities will be taken into account in consent decisions.</p> <p>AP316: The scope of this policy will be expanded to include all energy requirements.</p>

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	<p>of new telecommunication cables. Consideration of all sub sea cable corridors should be required with respect to any proposed development of new electricity / telecoms etc. infrastructure. We also highlight the need for particular consideration of consequent impacts, including cumulative impacts, in the coastal zone and for effective integration with terrestrial planning to safeguard the natural heritage of the coast.</p> <p><i>Alternative:</i> Please see above comments</p> <p>Proposed Policy 14: Ports and harbours</p> <p>With respect to ports and harbours, we would welcome clarification within this policy and supporting information as to the proposed relationship between this Plan and other relevant plans, including the NRIP. While the NRIP is not a statutory development plan it is intended to encourage growth through investment in port and harbour sites favoured by the market and is strongly referenced in the National Planning Framework. It therefore has strong influence on decision making with respect to ports and harbours developments in PFOW and beyond. We would as a minimum anticipate clear cross-referencing between the SEA for this Plan and that for the NRIP.</p> <p>At a project level, the consenting mechanism of port and harbour works can vary depending on what the applicant wants to do. Any individual proposal can involve one or all of three main consenting mechanisms, namely: 1) Town and Country Planning, 2) Harbour Empowerment Orders or Harbour Revision Orders, and 3) Marine Licences. The development of this Plan provides an important opportunity for decision making to be done in a joined up fashion between the marine and land planning systems and we would welcome a clear statement of intent on this policy to attain such a joined up approach. This can be facilitated, for example, by requiring developers to</p>	<p>AP317: Consolidate Proposed Policy 12 Electricity infrastructure to support marine renewables with Proposed Policy 18 <i>Development of new telecommunication cables</i>. Include the development of new pipelines and cover all electricity infrastructure in this policy area.</p> <p>Noted.</p> <p>The Draft Plan will set out the relation of the PFOW MSP to NPF3 and NRIP.</p> <p>AP318: Clear state the intention for the PFOW MSP to support joined up and consistent decision making within the 'How to Use the Plan' section of the Draft Plan.</p> <p>AP319: Explain how developments that cross the intertidal zone will be expected to be addressed EIAs within the Draft Plan.</p>

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	<p>prepare environmental impact assessments that cover all the required (terrestrial and marine) consenting mechanisms in a single document.</p> <p>We support the identification within the Plan of slipways and assessment of their usage but consider that this should include consideration of informal recreation as well as commercial use.</p> <p><i>Alternative:</i> We note the proposed alternative approach of developing fine scale planning around key ports to manage potential congestion in surrounding waters. We would be supportive of this where there was evidence of unresolved conflicts between users/wider interests (including natural heritage) but would see this as an additional element to more strategic policies rather than an alternative policy approach.</p> <p>Proposed Policy 19: Commercial Fisheries</p> <p>We suggest that there appears to be scope for further involvement of fisheries policy staff in Marine Scotland in the development of fisheries policies in this Plan, to ensure appropriate integration of Scottish Government policy goals in relation to fishing and other sectors, such as renewables, within the Plan area.</p> <p>In particular, the role of Inshore Fisheries Groups (or equivalent structures) should be reflected in this Plan and there should be cross-referencing, through iterative development of fisheries policies, between marine plans and relevant IFG management plans.</p> <p>A particular opportunity for the Plan is to consider the implications for other interests (including PMFs) of any potential displacement of fisheries (e.g. by</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>AP320: Liaise with Orkney Sustainable Fisheries Orkney Fisheries Association and fisheries interests in Caithness and Sutherland to insure appropriate integration of Draft Plan policies and fisheries management initiatives in PFOW.</p> <p>Noted. The displacement of fishing activity, and the assessment of potential effects, will be addressed in the</p>

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	<p>marine renewables) from currently used areas.</p> <p>As outlined in our response to Q14 (above), a key strategic issue for both IFG management plans and marine spatial plans is the need to reflect fisheries interactions (positive or negative) with existing or future MPAs and European marine sites (SPAs and SACs).</p> <p>We support the need identified in this paper to gather spatial information on fisheries activity and on locations of spawning grounds for commercially important species. However, we consider that safeguard of spawning grounds should be part of the preferred policy option, rather than an alternative to it.</p> <p><i>Alternative:</i> Please see above</p> <p>Proposed Policy 20: Aquaculture</p> <p><u>Preferred Option</u> We support the proposal for the Plan to utilise existing plans and policies as the basis for encouraging sustainable aquaculture development. However, some additional considerations might be taken in to account that have not been considered in previous plans and policies. For example, as far as we are aware, the plans and policies referenced in preferred option do not currently consider Priority Marine Features and Marine Protected Areas and we would advise that these should be considered in relation to aquaculture within this Plan.</p> <p><u>Alternative Approaches</u> Future offshore development: as far as we are aware the technologies required to locate aquaculture developments beyond the 3 nautical mile limit</p>	<p>Draft Plan Commercial Fisheries policy.</p> <p>AP321: Consider the effect of activities (e.g. fishing, shipping etc) on designation nature conservation sites within the relevant policy sections.</p> <p>AP322: Consider the use of available spawning grounds data within Commercial Fisheries policy(s) in the Draft Plan.</p> <p>Noted.</p> <p>The crosscutting (General Policies) will address issues in relating to PMFs and MPAs.</p> <p>Noted.</p>

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	<p>are unlikely to be developed within the foreseeable future.</p> <p>Commercial seaweed cultivation: the commercial cultivation of macroalgae is an emerging industry and considerable interest in the area has been expressed. As such it is likely that this industry will expand considerably in the foreseeable future. The Scottish Government is currently in the process of developing a national Seaweed Policy Statement (SPS) and accompanying Strategic Environmental Assessment (SEA) to support the sustainable development of this industry. It seems likely that this overarching national policy will provide a basis on which to develop a more detailed policy within the Plan. Both the SPS and SEA are expected to go out to consultation shortly.</p> <p>As indicated in our response to Q14, within the aquaculture policy we would also recommend specific consideration of harvesting of (uncultivated) seaweeds as there is current interest in possible future commercial harvesting within the Plan area. We can provide additional advice on associated natural heritage considerations as you take forward development of policies on this topic.</p> <p><i>Alternative:</i> Please see comments above</p> <p>Proposed Policy 21: Tourism and recreation</p> <p>We would like to see any policy developed in this area give greater weight to the importance of informal opportunities for recreational access to the sea and coast for the benefit of both local residents and visitors, irrespective of the potential commercial value of such activities. This links to our suggestion that safeguard of quality of life for residents and visitors should be a core principle within the Plan.</p>	<p>Noted.</p> <p>AP323: Seaweed harvesting will be addressed in the aquaculture section of the Draft Plan.</p> <p>Noted.</p> <p>AP324: Make sure that informal recreational opportunities are given appropriate weight within the coastal and marine reaction policy.</p> <p>AP325: A policy section safeguarding well-being and quality of life for coastal communities will be developed</p>

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	<p><i>Alternative:</i> Please see comments above</p>	<p>within the Draft Plan.</p> <p>AP326: A Quality of Life / Well Being policy section will be developed in the Draft Plan.</p>
<p>6 Scottish Environment Protection Agency</p>	<p>Proposed Policies 11, 12, 14, 15 and 18</p> <p>We support the proposed preferred options.</p> <p><i>Alternatives:</i> No.</p> <p>Proposed Policy 16: Marine Aggregates and Dredging</p> <p>We are supportive of the preferred option however we suggest that consideration is given to developing both the preferred option and the option currently suggested as an alternative; we suggest these could be complementary approaches.</p> <p><i>Alternatives:</i> No.</p> <p>Proposed Policy 17: Development of Coastal Protection and Flood Defence Infrastructure</p> <p>We support the proposed approach but highlight the requirement for any subsequent policy to ensure that any protection or flood defence works do not result in additional flood risk elsewhere.</p> <p><i>Alternatives:</i> No.</p> <p>Proposed Policy 19: Commercial Fisheries</p>	<p>Noted.</p> <p>Noted.</p> <p>AP327: A dredging and disposal policy will be developed in the Ports And Harbours section of the plan. A complementary but separate marine aggregates policy will be developed in the Draft Plan.</p> <p>Noted.</p> <p>AP328: Ensure that the Development of Coastal Protection and Flood Defence Infrastructure policy addresses potential effects on flood risk elsewhere.</p> <p>Noted.</p>

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	<p>Commercial fishermen are amongst the longest established users of the water environment in the area of the pilot. This use can generally be considered sustainable and supports a considerable number of downstream jobs in the wider economy. It is important that the interests of this sector are protected while the opportunities for others are considered and developed.</p> <p>It is often the case in such circumstances that fishermen are reluctant to share precise details of areas of interests – understandably because this may alert other fishermen to those opportunities. The proposed approach where the requirements of fishermen are collected through a number of different routes will be useful in protecting their interests but it is perhaps questionable how useful they will be in gathering information about the inshore crustacean fisheries – a very important component of both the Orkney economy and the fishery sector in the islands. It is not clear which further engagement routes would be available to yield useful outputs and this may require further consideration.</p> <p>The protection of spawning grounds of any population of fish or shellfish is fundamental to the survival of the species and therefore serious consideration should be given to the alternative approach in connection with these receptors where further development is excluded from such areas. This should especially be the case if they represent a significant or important local or national area for the reproduction of any individual species or group of species.</p> <p><i>Alternatives:</i> No.</p> <p>Proposed Policy 20: Aquaculture</p> <p>We agree with the proposed preferred option but highlight the need for the</p>	<p>Noted. The commercial fisheries policy in the Draft Plan will aim to safeguard the interests of the fishing industry.</p> <p>Noted.</p> <p>AP329: Consider the use of available spawning grounds data within Commercial Fisheries policy(s) in the Draft Plan.</p> <p>Noted.</p>

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	<p>Plan to refer to the related local development plan policies and spatial strategies.</p> <p>We consider that if there is any likelihood of commercial cultivation or extraction of seaweed within the plan area then the Plan should address this issue. The Scottish Government and Marine Scotland are currently in the process of producing a policy statement on seaweed farming, this should also be highlighted in the Plan.</p> <p>The Paper discusses the potential for aquaculture sites to be developed further offshore in the future. While it is not possible to state with certainty that such developments will not occur, we suggest that the probability is quite low for waters around Orkney. This is especially the case given the exposure and wind environment of the area making the development of such sites challenging in an engineering context.</p> <p>There has been some discussion around this issue within Orkney and nationally, for example the potential for aquaculture sites developing in conjunction with renewables – amongst the turbine towers at an offshore wind site. Synergies may not exist and there may be strong practical reasons why such developments will not be prudent. Thus while it is possible that aquaculture sites – most probably for finfish - could develop beyond 3 nautical miles the likelihood is low and the need for detailed examination of such developments within the Plan is limited.</p> <p><i>Alternatives:</i> No.</p>	<p>AP330: Address commercial cultivation / extraction of seaweed in the Aquaculture section of the Draft Plan.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p>
7 Pentland Canoe Club	No comments.	

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8 Scottish Water	<p>18 Development of new telecommunication cables</p> <p>We note the proposal to encourage the use of existing pipeline corridors for colocation.</p> <p>We would wish to be consulted further on this proposal where our assets may be affected as there would be a requirement to look at each proposal on a case by case basis</p> <p><i>Alternatives:</i> Scottish Water has no comment</p>	<p>Noted.</p> <p>AP331: Consider the need for developers to consult Scottish Water on pipeline and cable proposals that could potentially affect Scottish Water assets within the electricity and telecommunications infrastructure and oil and gas exploration and development policies in the Draft Plan.</p>
9 Caithness Kayak Club	<p>Tourism and Recreation</p> <p>The importance of the marine areas under discussion here must not be underestimated, both for the quality of life in the area, and for potential tourist industry development.</p>	<p>AP332: A Quality of Life / Well Being guiding principle and policy will be developed in the Draft Plan.</p>
10 Individual	<p>PROPOSED POLICY 11: MARINE RENEWABLE ENERGY</p> <p>Preferred Option: It is proposed that the sustainable growth of marine renewable energy and the potential for co-existence with existing marine users is a key objective of the pilot marine spatial plan. This approach would be supported by identifying where there is current use of the marine area by existing economic sectors and other users and provide information to better understand the nature of this use.</p> <p>A policy(s) will be developed to facilitate sustainable development of the marine renewable energy sector, working in partnership with wider stakeholders and other marine users. This policy would set out the material planning considerations that will be reconciled in the determination of a</p>	<p>Direct quote from PIOP.</p> <p>Direct quote from PIOP.</p>

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	<p>consent application and will set out how the interests of other marine users will be balanced in the decision making process. This policy would aim to avoid or minimise significant adverse effects on other economic sectors and marine users. Where appropriate, the policy would enable appropriate mitigation plans to be developed to address any potential adverse effects.</p> <p>The following is to identify the nature of recreational sailing in the PFOW Pilot plan in order to achieve a better understanding.</p> <p>Sailing can be split into two sections:-</p> <ol style="list-style-type: none"> 1. That which is mainly based in local areas and takes place in daylight hours such as dinghy sailing and in this pilot area Orkney Yoles 2. That which takes place round the clock and mainly concerns passage making and tourism. <p>It is with this latter group with which the spatial plan will have most concern.</p> <p>There are over 600 visiting yachts per year registering with Orkney Marinas. On top of this there are local boats plus the ones that prefer not to use marinas. In all this will account to over 2500 people arriving by sea every year mainly during the summer months. The nationalities of these people and their boats are world wide with the preponderance being UK and Europe.</p> <p>The marinas are generally used as a base with the boats cruising around the islands anchoring in various anchorages. Their crews will visit places of interest and most likely eat ashore. In this way they benefit the local economies.</p> <p>The Anatec Halcrow report Shipping Study of the Pentland Firth and Orkney</p>	<p>AP333: This helpful information will be considered when drafting the safeguarding coastal and marine recreation policy in the Draft Plan.</p> <p>Noted. This provides useful information for the contextual information in the Recreation, leisure and tourism section of the Draft Plan.</p> <p>Noted.</p> <p>Noted. The data within the Anatec Halcrow report</p>

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	<p>Waters gives an indication of the sailing routes around the area as depicted by AIS. This is only approximately 17% of the total number of craft. As one would expect routes converge as they come close to land. Fig 8.16 etc showing lane boundaries (an estimated quantity) gives a good idea of approach and departure routes.</p> <p>It is not possible to regulate routes over open water for recreational craft as it is for commercial vessels due to the following:-</p> <ol style="list-style-type: none"> 1. The purpose of sailing ie tourism, various interests, challenges. 2. The distance to the horizon from the cockpit of a small craft is only around 3 miles and that is in good visibility. 3. Poor visibility 4. Forces of wind, wave and tide make it so that the course made good may vary by at least 5 degrees on either side of the required course. 5. Navigation aids on board may not be strictly accurate or not working due to weather/sea conditions. 6. Poor weather. 7. Visual navigation aids not being clear especially when the only chance of seeing them is when you are on the crest of a wave. This can happen when modern lights such as light houses only appear to give a pin prick of light from a distance. With the old fashion lights you could generally see the loom even if in a trough. 8. Human failures such as tiredness, sea sickness, cold and wet. 9. Gear failure. <p>As mitigation for the above the following need to be observed</p> <p>Energy Act 2004 99 and 100 including 36B</p>	<p>Shipping Study of the Pentland Firth and Orkney Waters will support the appropriate policies in the Draft Plan e.g. The operation and safety of shipping and navigation policy.</p> <p>This is useful information. The Draft Plan will not regulate routes for recreational vessels.</p> <p>AP334: Consider the implications of the Energy Act 2004 99 and 100 including 36B, UNCLOS Sect 60, MCA Guidance Notes MGN275, MGN371, MGN372 and</p>

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	<p>UNCLOS Sect 60 MCA Guidance Notes MGN275, MGN371, MGN372 IALA Recommendation 0-139</p> <p>C) Shipping, Navigation and Marine Safety</p> <p>With a possible proliferation of wave and tidal generators, 66 in the Marwick Head proposal bringing about a high density of units in a small area, there is almost bound to be a risk of a vessel ending up amongst them in poor weather.</p> <p>Spacing of the units should be such that there is always an escape route. Although units would generally be far enough apart for maintenance purposes this would only take place in good weather. In poor weather including fog these distances would need to be greater especially if the RNLI lifeboat is called out.</p> <p>Normally when approaching land under poor conditions you use your depth sounder to indicate the approach of shallow water and match it to the chart. This is not possible where renewables are taken into account as except for the "Oyster" they are in relatively deep water, over 50m. Satellite navigation, if it has not been degraded, may be used if your paper/electronic charts are up to date but in many cases this may not be the case.</p> <p>There is much to be discussed as regards the safety of the mariner especially in the case of approaching Orkney from Cape Wrath and the need to avoid the wave renewables. For example when a vessel is approaching Orkney from the west, and according to AIS there can be many courses being sailed, in foul weather how does the skipper or helmsman know when he is</p>	<p>IALA Recommendation 0-139 in the development of Operation and safety of shipping and navigation, and safeguarding coastal and marine recreation policies in the Draft Plan.</p> <p>The safety issues for vessels will be addressed in the operation and safety of shipping and navigation policy in the Draft Plan.</p> <p>The safety issues for vessels will be addressed in the operation and safety of shipping and navigation policy in the Draft Plan.</p> <p>Noted. The safety issues for vessels will be addressed in the operation and safety of shipping and navigation policy in the Draft Plan.</p> <p>The safety issues for vessels will be addressed in the operation and safety of shipping and navigation policy and the marine renewable energy – offshore wind, wave and tidal policy in the Draft Plan.</p>

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	<p>approaching an area covered by renewables.</p> <p>On Radio Scotland this morning, 17th July, there was discussion concerning the reliability of satellite navigation and the need for back-up. I discussed this with the Captain of the MV Fram and he said that they use LORAN-C or the old fashioned plotting and dead reckoning. This is a ship that cruises the Arctic and Antarctic.</p> <p>There is a great need to improve communications and disseminate relevant information to all users above and beyond Admiralty Notices.</p> <p>You might have got the wrong International Regulation in Item 12.12 of the Consultation Paper. SOLAS, I think, is mainly concerned with the safety of ships in the manner of design, construction, fitting out, safety equipment etc. In the context of this case it should be UNCLOS Part V and may be specifically Article 60 concerning man made structures in the sea. The Spatial Plan does not have any control on the design, construction or operation of ships but it does have control on the installation of man made structures which will have affect on the safety on ships.</p> <p>PROPOSED POLICY 20: AQUACULTURE</p> <p>Finfish farming as well as being a high money earner creates various ecological and social problems.</p> <ol style="list-style-type: none"> 1. It is a high pollutant of the seabed and surrounding water. Cages are often sited in areas where there is very little water movement thus exacerbating the problem eg Swanbister Bay, Scapa Flow. 2. There is a high possibility that disease in the stock causes infections in wild fish. 	<p>Noted.</p> <p>Noted.</p> <p>AP335: Consider the implications of UNCLOS Part V (specifically Article 60) when drafting the operation and safety of shipping and navigation policy, and other relevant policies, in the Draft Plan.</p> <p>Noted. Detailed local planning policies issues for aquaculture are currently addressed in Local Development Plans and associated supplementary guidance.</p>

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	<p>3. The equipment for servicing the fish farms creates marine litter and diesel engine pollution of the atmosphere.</p> <p>4. Cages are often sited in bays of natural beauty which would previously have been used as anchorages eg Pegal Bay and Lyrawa Bay in Scapa Flow.</p> <p>5. Cages have also been sited in safe havens thus precluding them from their natural purpose eg Hunda Sound.</p> <p>To overcome the above Closed Containment Systems such as from “Fishfrom” should be considered. These systems are contained onshore and have no connection with the open sea. Energy for running these systems would come from renewables. See Fishfrom.com as regards their Scottish establishment in Kintyre.</p> <p>The gathering of seaweed for commercial purposes used to take place in Orkney. I note that in Feb 89 approval was given to Kelp Farms Ltd, 73 Meadow Lane Leeds, LS11 5DW for the cultivation of 7.75 hectares of kelp at Scat Wick, Flotta. I cannot remember this taking place.</p>	<p>Noted.</p> <p>Noted.</p>
<p>12 Orkney Sustainable Fisheries Ltd.</p>	<p>19: Commercial Fisheries</p> <p>Section 12.30 suggests that the value of landings into Wick and Orkney in 2012 were £18 billion. We are unsure where this figure came from. The Scottish Government’s landing statistics for 2011 put landings for Orkney at £7,580,000 and Scrabster (Wick is not within the plan area anyway) at £32,281,000.</p> <p>Value of landings and employment figures should also have been provided in Section 12.31 to highlight the fishing industry’s economic importance. Furthermore, mention should also have been made of the Orkney Fishermen’s Society and its role in adding value to fishery products.</p>	<p>Noted. This will be corrected and addressed in the Draft Plan.</p> <p>Noted. The economic importance of the fishing industry will be addressed in the Draft Plan.</p>

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	<p>We welcome the proposed approach towards presumption against development in spawning and nursery grounds. This would be required for the plan to be consistent with an ecosystem approach.</p> <p><i>Alternatives:</i> We recommend fisheries policies similar to those expressed in the Shetland Marine Spatial Plan:</p> <p>Safeguarding Fishing Opportunities</p> <p>All relevant organisations and stakeholders to work with the local fishing community to safeguard future sustainability of the industry and their stocks.</p> <p>Development proposals will not normally be permitted if they obstruct an important fishing ground. An important fishing ground will be defined by the frequency of use, productivity or community dependence of an area, which has been determined by local fishermen.</p> <p>Local management of Sustainable Fisheries</p> <p>Fishermen designed local fisheries management will develop appropriate measures so that fishing is not carried out in ways that damage important habitats and species.</p>	<p>AP336: Consider the use of available spawning grounds data within the Commercial Fisheries policy(s) in the Draft Plan.</p> <p>AP337: Review Shetland Marine Spatial Plan Policy MSP FISH 1 <i>Safeguarding Fishing Opportunities</i> and to take cognisance of this policy in the drafting of appropriate policy(s) within the Draft Plan.</p> <p>AP338: Review Shetland Marine Spatial Plan Policy MSP FISH 1 <i>Safeguarding Fishing Opportunities</i> and to take cognisance of this policy in the drafting of appropriate policy(s) within the Draft Plan.</p> <p>AP339: Review Shetland Marine Spatial Plan Policy MSP FISH 1 <i>Safeguarding Fishing Opportunities</i> and to take cognisance of this policy in the drafting of appropriate policy(s) within the Draft Plan.</p> <p>AP340: Review Shetland Marine Spatial Plan Policy MSP FISH 1 <i>Safeguarding Fishing Opportunities</i> and to take cognisance of this policy in the drafting of appropriate policy(s) within the Draft Plan.</p>
13 Royal Yachting	Policy 11 Marine Renewable Energy	

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Association	<p>We support the first paragraph of the preferred option. However, we feel that the second paragraph is open to interpretation in relation to the wording 'minimising significant adverse effects'. We would prefer the wording to reflect that all adverse effects on other stakeholders, whether financial or in relation to safety, will be addressed. Furthermore, the last sentence of this paragraph reads 'Where appropriate, the policy would enable appropriate mitigation plans to be developed...'; in our view it is essential that the policy must do this and we seek reassurance that the policy wording can be altered to reflect this. The policy needs to be consistent with the Plan for Wind, Wave and Tidal Renewable energy, which will be shortly out for consultation, and with existing licensing procedures as well as international treaty obligations.</p> <p>However, while supporting the preferred option, it is important to recognise that some activities are simply incompatible with some areas. Zoning in some areas is thus an interesting alternative approach that is not without its merits. Indeed the consultation document has already raised the possibility of safeguarding some activities. The RYA has produced position papers in relation to offshore wind, wave and tidal renewable installations which provide more detail on these points; the papers are available to download from this link</p> <p>http://www.rya.org.uk/infoadvice/planningenvironment/offshorewindenergy/Pages/OffshoreEnergyDevelopments.aspx</p> <p><i>Alternatives:</i> No</p> <p>Policy 13 Shipping, navigation and marine safety</p> <p>All navigational traffic should be considered under such policies. We thus suggest changing the wording so that instead of '.....potential effect of</p>	<p>Noted. The draft Plan will be consistent with existing and emerging SG legislation and guidance on marine spatial planning.</p> <p>AP341: The sections on marine transport will be clear that it covers all marine traffic and safety of shipping and</p>

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	<p>development on existing and future use of the marine area for shipping....' it reads '....potential effect of development on existing and future use of the marine area for commercial shipping and recreational vessel activity...'. The preferred option should make explicit reference to marine safety as this is an increasingly important issue due to increased risk to mariners from the proliferation of offshore developments.</p> <p><i>Alternatives:</i> No</p> <p>Policy 14 Ports and harbours</p> <p>We welcome paragraph 12.21. It will be important to emphasise the need to consider other activities and uses than offshore renewables throughout any development planning so they do not become an afterthought or add on, or opportunities for synergistic developments are lost. Numerous references are made throughout the report to the importance of other activities from an economic and societal point of view and this should be reflected across the policies as appropriate. For example, some slipways and piers are small but provide an important facility for small boats; there is a danger that they are overlooked and deprived of the maintenance necessary to prevent storm damage.</p> <p><i>Alternatives:</i> No</p> <p>Policy 20 Aquaculture</p> <p>The policy should be consistent with the relevant parts of the Scottish Planning Policy. The RYA has produced a position paper on aquaculture that shows how fish farming and recreational boating can coexist. However, recreational boating has already lost some sites to aquaculture in the PFOW</p>	<p>navigation will be have supporting policies.</p> <p>Noted.</p> <p>AP342: These comments will be taken into account when drafting the Ports and Harbours section.</p> <p>Noted.</p>

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	<p>area. Cages are often sited in bays of natural beauty which would previously have been used as anchorages, e.g. Pegal Bay and Lyrawa Bay in Scapa Flow. Cages have also been sited in anchorages, such as Hunda Sound, thus precluding them from their use as a refuge in case of adverse weather.</p> <p>The plan should take account of all possible uses of the sea. Seaweed used to be gathered in Orkney and there are plans for commercial seaweed cultivation in other parts of Scotland. The RYA position paper on aquaculture includes seaweed farming. As a matter of principle we think that unless there are compelling arguments for an activity being impossible in PFOW, there should be a catch-all policy to take account of unexpected developments.</p> <p><i>Alternatives:</i> No</p> <p>Policy 21 Tourism and recreation</p> <p>We strongly support this policy.</p> <p><i>Alternatives:</i> No</p>	<p>The sustainable development section of the Draft Plan will consider all activities.</p> <p>Noted.</p>
14 Orkney Sea Kayak Association	<p>Proposed Policy 21.</p> <p>We believe that Tourism and Recreation should have separate policies. (See comment in Q.1 and Q.4).</p>	<p>AP343: Develop separate tourism and recreation policy sections.</p>
15 Kirkwall Kayak Club	<p>Proposed Policy 21.</p> <p>We believe that Tourism and Recreation should have separate policies. (See comment in Q.4).</p>	<p>AP344: Develop separate tourism and recreation policy sections.</p>
16 SportsScotland	<p>PP21 tourism and recreation</p> <p>We are pleased to note the reference to the health and social benefits of</p>	<p>AP345: A Quality of Life / Well Being policy section will</p>

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	<p>recreation as well as their economic.</p> <p>In addition to identifying important sites and areas for recreation it will be important to understand the qualities that are integral to participation and are valued by participants. This will include things like the type and quality of waves, the lack of noise pollution, clean unpolluted water, the quality of the landscape etc. Impacts on recreation are about impacts that physically prevent the activity taking place but are also about impacts that negatively affect the quality of the experience. Both should be protected by policy.</p> <p>It would be useful as part of the work that is being carried out to assess the recreational resource of the area to determine how important a site is for an activity. Thurso East or the Scapa Flow wrecks for example are internationally important and perhaps merit stronger policy protection than other resources in the area.</p> <p>We strongly support the positive approach advocated to land based facility development supporting recreational use of the marine environment.</p> <p>It will be important for policy in this sector to draw out the qualities that are important from a tourism perspective and those which are important from a sport and recreation perspective. We recognise that the two sectors are linked but they are also different and policy needs to be clear what a resource is being protected for. Thurso East for example is fundamentally important because of the quality, reliability and accessibility of the wave. It is also important because it attracts national and international events and brings people from all over the world to surf it, contributing significantly to the local economy. These are two distinct values that it is important to distinguish between in policy. As an additional example, there may be some remote and challenging coastal rock climbs in the area which are only used by a small</p>	<p>be developed in the Draft Plan.</p> <p>A tourism and recreation study will be carried out to provide detailed information to inform the Draft Plan.</p> <p>Noted.</p> <p>We shall be developing separate tourism and recreation sectors that will take account of the comments made.</p>

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	<p>number of people. These may be strategically important for the sport but of little value as a tourism resource. Policy needs to be clear what it is that is being protected.</p> <p>We would like to see tourism and recreation policy put at the start rather than the end of the plan. There is always a concern that this sector is not taken as seriously as other sectors and for it to appear at the end of the list of sectors only serves to augment these fears. Putting this policy area up front in the plan sends a clear message that the sector is key.</p> <p>In terms of identifying the key sites and areas, sportscotland requests to be involved in this process. It would be very useful to know what criteria are being used to identify and quantify what sites are important and whether a hierarchy of sites is being developed.</p> <p>We are concerned by the use of the term <i>due regard</i> in para 1 of the preferred option. While we appreciate this is not the policy wording we would be concerned if a term like due regard was used in the final policy. Due regard is ambiguous and potentially weak and we would look for much stronger wording stating development etc will be refused where etc.</p> <p>As well as existing facilities and areas and routes important for recreation, it will be important for policy to protect opportunities for expansion and future development in the sector.</p> <p>PP11 – Marine renewables</p> <p>We note that this sections talks of mitigation and avoidance and minimisation of impacts. It is important for policy to be clear that there may be impacts that cannot be avoided or mitigated against and that in some circumstances renewable development should just not be allowed.</p>	<p>A tourism and recreation case study on the PFOW is being undertaken to inform the Draft Plan, highlighting our commitment to ensuring the plan-making process is based on the most up to date sound evidence wherever possible.</p> <p>AP346: The policy sections will be ordered to reflect the order of policy in the national marine plan.</p> <p>Noted.</p> <p>Noted.</p> <p>Any individual would have to conform to both the Plan and existing legislation and guidance. If negative impacts were considered insurmountable it would not be permitted.</p> <p>The section on safety will be clear that it covers all</p>

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	<p>PP13 – safety</p> <p>Safety is a key concern for recreation interests and the safety of recreational users should be integral to policy in this area. Safety may be about more than impacts on navigation and could include e.g. impacts of water pollution on the safety of other users or that development could force recreational users into less safe areas to do their activity, or that development impacts on coastal processes to make participation in an activity more dangerous.</p> <p>PP14 – Ports and Harbours</p> <p>It is important to add sport and recreation to the list of sectors that the development of this resource will be important to and that recreation is fully taken into account in the integration of different users of this resource.</p>	<p>marine users.</p> <p>AP347: These comments will be taken into account when drafting the Plan.</p>
<p>17 The Crown Estate</p>	<p>Proposed Policy 11: Marine renewable energy</p> <p>The PFOW area is rich in wave and tidal resources and will play a key role in the development of commercial scale wave and tidal energy projects, the success of which will form the cornerstone of the growth of the wave and tidal industry in Scotland. In addition, the area is of exceptional environmental quality and is an important area for fisheries, aquaculture, shipping, recreation and tourism. Therefore it is important that the plan facilitates the development of wave and tidal technologies whilst also ensuring due consideration of environmental factors and other users of the sea.</p> <p>Given the advanced stage of the twelve wave and tidal projects with Agreements for Lease with The Crown Estate, we welcome the proposal in the supporting text to consider these developments as ‘planned developments at the licensing stage’.</p>	<p>The Draft Plan Guiding Principles, Vision, Aims, Objectives and Policies will support the stated approach.</p> <p>Noted.</p>

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	<p>In terms of future marine renewable energy development, we support reference to the Sectoral Plans for wave and tidal energy development which are currently being developed by Marine Scotland. It would be useful for the plan to set out how the Sectoral Plans will be used to inform development within the PFOW area.</p> <p>We welcome the general approach of the preferred option set out in the report. However, the text could be expanded to provide further clarity. We suggest the following:</p> <p><i>It is proposed that the sustainable growth of marine renewable energy and the potential for co-existence with existing marine users is a key objective of the pilot marine spatial plan. This approach would be supported by identifying where there is current use of the marine area by existing economic sectors and other users and provide information to better understand the nature of this use.</i></p> <p><i>A policy(s) will be developed to facilitate sustainable development of the marine renewable energy sector, working in partnership with wider stakeholders and other marine users. This policy would set out the material planning considerations that will reconciled inform the determination of consent applications and will set out how the interests of other marine users will be addressed balanced in the decision making process. This policy would aim to avoid or minimise significant adverse effects on other economic sectors, and marine users and the environment. Where appropriate, the policy would enable appropriate mitigation plans to be developed to address any potential significant adverse effects.</i></p> <p>Proposed Policy 12: Electricity infrastructure to support marine renewable energy projects</p>	<p>AP348: Explain the relationship between the Sectoral Plans and the PFOW MSP in the Draft Plan marine renewable energy section.</p> <p>The wording of the Proposed Policy 11 'Preferred Option' is not intended to be an exact wording for the Draft Plan policy.</p> <p>AP349: Take cognisance of suggested text changes in the Draft Plan policy for marine renewable energy.</p>

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	<p>We welcome recognition of the need for onshore infrastructure for offshore renewable energy developments in the PFOW area and enhancements to the grid infrastructure connecting Orkney to mainland Scotland as a Proposed National Development within the National Planning Framework 3 Main Issues Report and Draft Framework. However, it is our understanding that while onshore infrastructure includes electricity infrastructure, it may also include other infrastructure required for the successful delivery of projects.</p> <p>In terms of the preferred approach, we suggest the proposed policy is reworded:</p> <p><i>It is proposed that a policy is developed within the pilot marine spatial plan that enables significant direct, indirect or cumulative effects on the environmental receptors and marine and coastal users to be assessed and, where appropriate, identify require appropriate mitigation measures.</i></p> <p>We note the intention where physically and technically feasible to route new export cables in pre-defined cable corridors determined from the location of existing cable infrastructure. While the designation of cable corridors could limit the number of cable landfall points on the coastline and limit potential impacts for other seabed users, it could also present technical challenges for existing cable operators. The routing of new infrastructure on or within close proximity to existing cables can compromise the ability of existing operators to effectively maintain and access their infrastructure and these restrictions should be considered when assessing the overall benefit of directing cables to predefined corridors.</p> <p>We anticipate that the submarine cables sector is likely to voice concerns on the implications of cable corridors, the benefit they can offer for the cable sector and the ability of the marine planning authorities to implement such a</p>	<p>Noted.</p> <p>The wording of the Proposed Policy 12 'Preferred Option' is not intended to be an exact wording for the Draft Plan policy.</p> <p>AP350: Take cognisance of suggested text changes in the Draft Plan policy for marine renewable energy.</p> <p>Noted. It is not the intention to designate cable corridors in the Draft Plan. It is proposed that the Draft Plan will identify the location of existing cables, and where physically and technically possible, proposed new cables will be encouraged to follow existing cable routes.</p> <p>Noted. It is not the intention to designate cable corridors in the Draft Plan. It is proposed that the Draft Plan will identify the location of existing cables, and where</p>

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	<p>framework. However, we appreciate and support the approach generally and suggest that close working and consultation with industry will be required to ensure such an approach is a success. We are very willing to work with Marine Scotland to explore the development of such an approach.</p> <p>The ability of offshore renewable energy developers to route infrastructure to predefined corridors should also be considered. As noted above, in March 2012, The Crown Estate commissioned a desktop study which identified, reviewed and assessed the factors affecting the routing and spacing of transmission cables for offshore wind farms. The findings, conclusions and recommendations from the study form the basis of our report and are available to download from our website: http://www.thecrownestate.co.uk/energy-infrastructure/cables-and-pipelines/studies-and-guidance/cable-routing-and-spacing-study/.</p> <p>Although the project specifically related to offshore wind, many of the principles and technical issues discussed in the report are relevant to other forms of offshore renewable energy generation.</p> <p>Proposed Policy 13: Shipping, Navigation and Marine Safety</p> <p>We support the proposal to develop a policy to support the assessment of the potential effect of development on existing and future use of the marine area for shipping and navigation giving due regard to identified navigation routes. We also refer to the Strategic Area Navigation Appraisal Project (SANAP:) currently being undertaken by consultants Anatec on behalf of The Crown Estate, in conjunction with a working group which includes key stakeholders such as Marine Scotland, NLB and MCA. A discussion paper summarising the key shipping and navigational issues related to wave and tidal energy in the PFOW is due in early autumn 2013 and we are happy to provide further</p>	<p>physically and technically possible, proposed new cables will be encouraged to follow existing cable routes.</p> <p>AP351: Consider these studies when drafting the relevant policies in the Draft Plan.</p> <p>Noted.</p> <p>Noted.</p>

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	<p>information on this project to assist the development of this policy.</p> <p>Proposed Policy 14: Ports and harbours</p> <p>We support the proposal to develop a policy which identifies the sustainable growth of identified ports and harbours as one of the key objectives of the plan.</p> <p>Proposed Policy 15: Oil and Gas</p> <p>No comment.</p> <p>Proposed Policy 16: Marine aggregates and dredging</p> <p>The preferred policy option relates specifically to dredging activities for port and harbour operations but does not propose a policy option of aggregate activities. Therefore, we suggest the proposed policy is expanded to include reference to aggregates activities</p> <p>The British Geological Survey, on behalf of The Crown Estate, is nearing completion of a resource mapping project to spatially map sand and gravel resource on the UK continental shelf³. This project has been specifically designed for use by planning authorities and provides a comprehensive assessment of sand and gravel resource opportunity offshore; consistent with the principles of safeguarding. This has the potential to be a useful data resource when developing the plan and once the data is available, we will share this for the plan area.</p> <p>³ As an example of the expected outputs, a link to the first stage report for the east of England can be found on our website here:</p>	<p>Noted.</p> <p>N/A</p> <p>AP352: A separate policy will be developed for Dredging and Disposal, and Marine Aggregates.</p> <p>AP353: This study will be used to inform the preparation of a marine aggregates policy in the Draft Plan.</p>

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	<p>http://www.thecrownestate.co.uk/media/340963/BGS%20east%20coast%20report.pdf</p> <p>Proposed Policy 17: Development of coastal protection and flood defence infrastructure</p> <p>No comment.</p> <p>Proposed Policy 18: Development of new telecommunication cables</p> <p>No comment.</p> <p>Proposed Policy 19: Commercial fisheries</p> <p>No comment.</p> <p>Proposed Policy 20: Aquaculture</p> <p>The proposed approach is not to set out a new regional planning policy framework for aquaculture as this is a statutory responsibility of the terrestrial planning regime (out to 3 nautical miles). However, we would like to see the plan support sustainable growth of the aquaculture industry by encouraging Local Planning Authorities to adopt a ‘planning for business’ approach to aquaculture development, considering at a strategic level where the most viable areas are for the nature and scale of developments industry requires, and how these can be best supported whilst ensuring environmental, social and economic objectives are met.</p> <p>Proposed Policy 21: Tourism and recreation</p>	<p>N/A</p> <p>N/A</p> <p>The Draft Plan will support the sustainable growth of aquaculture. The spatial strategy for aquaculture is set out in the relevant supplementary guidance.</p>

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	No comment.	N/A
19 RSPB	No comments.	N/A
20 Highland Council	<p>Proposed Policy 12: Electricity infrastructure to support marine renewable energy projects</p> <p>This policy should relate to electricity infrastructure to support not only marine renewable energy projects but all energy requirements.</p> <p><i>Alternatives: No</i></p> <p>Proposed Policy 14: Ports and harbours</p> <p>Paragraph 12.18 should make reference to the recent agreement to build an Oil Supply base at Scrabster to service the west of Shetland business.</p> <p>Paragraph 12.19 recognises that, although it is outwith the Plan area, Wick Harbour supports activities in the Plan area. The Plan should also acknowledge that there are other facilities and service bases outwith the Plan area that could help to support activities in the Plan area, e.g. Subsea 7 (Wester, Caithness) and Nigg Yard (Easter Ross). Ongoing National Renewables Infrastructure Plan (NRIP) work is providing information on the potential role(s) of the facilities and service bases.</p> <p><i>Alternatives: No</i></p> <p>Proposed Policy 15: Oil and Gas</p>	<p>AP354: The scope of this policy will be expanded to include all energy requirements.</p> <p>AP355: Make reference oil supply base at Scrabster in Ports and Harbours section of the Draft Plan.</p> <p>AP356: Make reference Subsea 7 (Wester, Caithness) and Nigg Yard (Easter Ross) in the Draft Plan, where appropriate.</p>

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	<p>There should be reference to the recent agreement to build an Oil Supply base at Scrabster. Also, the policy should note the use of Wick John O'Groats airport as an emerging transport hub for oil workers and ship crews.</p> <p><i>Alternatives:</i> No</p> <p>Proposed Policy 16: Marine aggregates and dredging</p> <p>Paragraph 12.25 indicates that there is currently no identified development pressure for the extraction of marine aggregates in the Pentland Firth and Orkney Waters. Nevertheless, need could arise in the future, particularly bearing in mind the number and size of construction projects that could occur in the area in coming years. Clearly any proposals for extraction would need to be considered carefully in terms of their likely impacts. The Council's support for the preferred option is on the understanding that it would not preclude appropriate marine aggregate extraction in the Plan area.</p> <p><i>Alternatives:</i> No</p> <p>Proposed Policy 21: Tourism and recreation</p> <p>In terms of both the safeguarding of tourism and recreation interests and the consideration of proposals for tourism and recreation development, the Plan policy should address both land-based coastal interests/proposals and those that are marine-based.</p> <p><i>Alternatives:</i> No</p>	<p>AP357: Make reference oil supply base at Scrabster in the Draft Plan, where appropriate.</p> <p>AP358: Following the consideration of the responses to the Planning Issues and Options Paper, a marine aggregates policy will be developed in the Draft Plan.</p> <p>Noted. The PFOW tourism and recreation study will consider land based coastal interests/proposals to inform a separate recreation policy within the Draft Plan.</p>
21 Scottish Renewables	<p>Proposed Policy 11: Marine Renewable Energy</p> <p>We are pleased to see the plan will develop policies to 'facilitate sustainable</p>	<p>AP359: Develop the marine renewable energy policy in</p>

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	<p>development of the marine renewable energy sector'. However, the relationship between the plan, the role of MS LOT existing licensing guidance is unclear. The plan must be very clear about its relationship with the existing licensing regime which is carried out by the Marine Scotland Licensing and Operations Team on behalf of Scottish Ministers who are the ultimate decision makers.</p> <p>We also support treating areas already subject to agreements for lease as 'planned developments at the licensing stage'.</p> <p>We also believe there should be a presumption of use for marine energy developments in the new plan options identified in the Scottish Government's sectoral plans.</p> <p>Consideration should also be given to how the plan could contain policies in relation to the Marine Energy Park designation, particularly how it may help to facilitate and streamline the planning and licensing of renewable energy projects within the Park area.</p> <p>The ability for renewable energy developments to co-exist with other marine sectors can only be considered on a case by case basis. We strongly believe areas suitable for renewable energy developments should be prioritised for this sector. As stated previously, the industry works closely with other users</p>	<p>close consultation with MS-LOT to ensure consistency of approach.</p> <p>Noted.</p> <p>AP360: The Draft National Marine Plan policy 'Renewables 1' states 'there is a presumption in favour of the adopted Plan Options identified through the Sectoral Marine Plan process'. The Draft Plan will be in conformity with the policies with the National Marine Plan as required by the Marine (Scotland) Act 2010.</p> <p>Noted. The Marine Energy Park will be acknowledged and supported within the Draft Plan.</p> <p>Noted. The Draft Plan will identify existing use/activities and potential environmental sensitivities etc. to inform consenting in the marine environment. It is acknowledged that different locations, technologies, environmental factors and marine use/activities will require a case by case approach to be taken to achieving co-existence through the consenting process.</p>

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	<p>of the marine environment, through groups such as FLOWW and NOREL, to produce guidance which would enable coexistence. The guidance has to take account of differences between devices, between uses of the area and differences in the natural environment in that area which can affect how the various sectors interact. The plan should recognise these considerations and refer to the appropriate sectoral guidance.</p> <p>It is important all sectoral and overarching policies are consistent with the policy of facilitating the sustainable development of the marine renewable energy sector.</p> <p>Proposed Policy 12: Electricity Infrastructure to Support Marine Renewable Energy Projects</p> <p>We support the recognition of the importance of electricity infrastructure to the growth of the energy sector and the wider economy. Grid infrastructure developments are absolutely crucial to the development of marine energy and the plan must facilitate them.</p> <p>Direct, indirect or cumulative environmental effects and the requirement for mitigation measures are already assessed through the existing licensing processes. The plan must be consistent with current legislative requirements and not add additional burden to developments in the area.</p> <p>Proposed Policy 13: Shipping, Navigation and Marine Safety</p> <p>The plan should recognise the work of the Nautical and Offshore Renewable Energy Liaison Group (NOREL).</p> <p>NOREL aims to ensure that the commercial and recreational shipping and</p>	<p>Noted. The sustainable development of all the identified economic sectors will underpin the Draft Plan including marine renewables.</p> <p>Noted.</p> <p>Noted. The Draft Plan will provide a decision making framework for marine licensing that all stakeholders have an opportunity to contribute towards. The Plan will be compliant with current legislative requirements.</p> <p>Noted.</p> <p>AP361: Utilise NOREL guidance to inform the</p>

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	<p>ports industries can successfully co-exist with the offshore renewable energy industries and that the needs of both are taken into account in Government policies on shipping and offshore renewable energy. NOREL is in the process of developing guidance in relation to under keel clearance for marine renewable devices.</p> <p>Proposed Policy 14: Ports and Harbours</p> <p>As with the development of electricity infrastructure, the sustainable growth of port and harbour infrastructure is absolutely key for the growth of the marine renewable energy sector. The plan should therefore support and help to facilitate the port and harbour requirements for the marine energy sector as identified in the National Renewables Infrastructure Plan (NRIP).</p> <p>As indicated in the NRIP Stage 1 Report, infrastructure to support the Pentland Firth and Orkney Waters leasing area is an immediate need. NRIP Stage 2 highlights the developing infrastructure needs of the sector from now to beyond 2020.</p> <p>A range of locations could support the marine renewable energy industry, including during installation, fabrication, and operations and maintenance phases. The report also highlights that all ports in both Caithness and Orkney that could host or are already hosting deployment activity have development plans with at least guideline costs for expansion of existing facilities. Lead times vary, but three years to delivery, including obtaining planning permissions and financing should be allowed for, and hence developer input on requirements for larger scale deployments scheduled from 2017 onwards will need to be determined by 2012-2013 at the latest and work needs to begin by 2014 at the latest. Further, it makes clear '...some decisions on port development and use may have to be made before there is any specific</p>	<p>development of the marine renewables and navigation and shipping policies in the Draft Plan.</p> <p>Noted.</p> <p>AP362: Develop the Draft Plan ports and harbours policy within the context of NRIP.</p> <p>Land use allocations and policies are within the remit of local development planning. Local planning authorities have made land use allocations at the strategic port and harbour locations with PFOW to support the future needs of the renewable energy sector. Associated marine infrastructure will be supported in the Draft Plan.</p>

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	<p>certainty in the market in order to meet the deployment timetables as they are currently planned.'</p> <p>Proposed Policy 19: Commercial Fisheries</p> <p>Again, we highlight the work of both FLOWW and the Scottish Government's Fishing Liaison Group to aid co-existence. We are very supportive of the intention to include heat maps of activity levels, other areas of importance, spawning and nursery grounds as supporting spatial information. This information will be very useful to developers.</p>	Noted.
22 Scottish Wildlife Trust	No comments.	N/A
23 Scottish Power Renewables	<p>Page 72, Proposed Policy 11 [Marine Renewable Energy]</p> <p>This section deals with wave and tidal; however, it should be expanded to include offshore wind given the upcoming sectoral plans that will cover this activity within the PFOW MSP area.</p> <p>SPR do not believe that areas should be zoned in relation to offshore and marine renewables. Areas selected for development go through a very rigorous process and take all conflicts with other users into account. Additionally there are likely to be future advances in technologies that will open up areas of resource not currently considered to be commercially viable. These areas will be lost to future developments if areas are zoned this early in the development of the marine renewables sector.</p> <p>Page 73, Paragraph 12.10 [Electricity Infrastructure to Support Marine Renewable Energy Projects]</p>	<p>Offshore wind will be included in this section of the Draft Plan.</p> <p>Noted.</p>

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	<p>Although marine renewables is the driver in relation to the electricity infrastructure it should be made clear that all will benefit from any upgrading as the grid does not discriminate between sectors or technologies.</p> <p>Page 76, Proposed Policy 13 [Shipping, Navigation and Marine Safety]</p> <p>This section appears to focus on developments. However, there should be awareness that all new activities and expansion within any sector will have implications with regards this policy area and should be considered.</p> <p>Page 84, Proposed Policy 20 [Aquaculture]</p> <p>The phrase “<i>foreseeable future</i>” is used here – how does this align with the ambitions of other parts of the PFOW MSP in having a 20 year outlook?</p> <p>Page 85, Proposed Policy 21 [Tourism and Recreation]</p> <p>This section appears to focus on developments. However, there should be awareness that all new activities and expansion within any sector will have implications with regards this policy area and should be considered. For instance an expansion of one tourism activity may impact upon other tourism activities.</p>	<p>AP363: The scope of this policy will be expanded to include all energy requirements.</p> <p>AP364: Clearly state that the effects of development and activities on shipping, navigation and marine safety will be considered within the relevant policies in the Draft Plan.</p> <p>The ‘<i>foreseeable future</i>’ was used to allow stakeholders to respond as they see appropriate. The Draft Plan vision will be for a 20 year outlook and the Draft Plan policies will be drafted within this context.</p> <p>AP365: Ensure that all new activities, as well as developments, are considered within this policy area.</p>
24 Orkney Renewables Energy Forum	The sectorial policies are generally welcome and the approaches identified seem to pay appropriate credence to each of the issues raised. No further comments to make.	Noted.
25 Scottish Salmon Producers	<p>POLICY 14 - PORTS AND HARBOURS</p> <p>Scapa Flow Transhipment Hub. See SSPO comments on NPF 3 MIR.</p>	Concerns noted. The Draft Plan will be informed by the

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Organisation	<p>Continuing uncertainty about whether or not the development will happen should not blight the area for other forms of development, e.g. fish farming.</p> <p>POLICY 20 – AQUACULTURE</p> <p>(i) Para. 12.33 - should be Town and Country Planning (Scotland) Act 1997 as amended by the Planning etc. (Scotland) Act 2006.</p> <p>(ii) Para. 12.35 - See responses to Q2 and Q14 above.</p> <p>(iii) Proposed Policy - See responses to Q6 and Q14 above.</p>	<p>emerging NPF3.</p> <p>AP366: Amend reference to legislation in the Draft Plan if required.</p> <p>Noted.</p> <p>Noted.</p>
26 Orkney Trout Fishing Association	Comments in Question 19 box.	Noted.
27 Colin Kirkpatrick	Comments in Question 19 box.	Noted.
28 Carol Breckenridge	No comments specifically attributed to this section.	N/A
29 Highlands and Islands Enterprise	<p>Proposed Policy 11 Marine and Renewable Energy</p> <p>HIE support the preferred option HIE do not suggest an alternative approach.</p> <p>Proposed Policy 12 Electricity infrastructure to support marine renewable energy projects</p>	Noted.

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	<p>HIE support and recognise the importance of the electricity infrastructure to support the growth of the marine energy sector and also the wider economy in the PFOW. Grid infrastructure and connection are fundamentally pivotal to the development and commercialisation of the marine sector in the PFOW area and this plan should be clear at assisting the progress of this.</p> <p>HIE do not suggest an alternative approach.</p> <p>Proposed Policy 13 Shipping, Navigation and Marine Safety</p> <p>HIE are in agreement with MS on this option and have nothing to add.</p> <p>HIE do not suggest an alternative approach.</p> <p>Proposed Policy 14 Ports and Harbours</p> <p><i>Alternative:</i> One of the most important factors in the growth of the marine renewable energy sector is the growth of ports and harbours infrastructure – very little will happen until the infrastructure requirements of the sector are looked at and the findings acted upon. NRIP 1 and 2 have identified what is required around the PFOW area and beyond to sustain and grow the marine renewable energy sector.</p> <p>Proposed Policy 18 Development of new telecommunication cables</p> <p>There may be plans to further develop the telecommunication cables in the PFOW and this should be taken into consideration when MS are looking at their already in place exclusion zones around cables already in place. They need to be aware new cables will most probably be required by 2020.</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>AP367: Develop the Draft Plan ports and harbours policy within the context of NRIP.</p> <p>Noted.</p>

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	<i>Alternative:</i> No further comment	N/A
30 Dounreay Site Restoration Ltd.	Comments in Question 19 box.	
32 Scottish Fishermen's Association	<p>Proposed Policy 11: Marine renewable energy</p> <p>The Fishing industry must be one of the first consultees at the start of any prospective renewables development. Historically the catching sector has been presented with development plans which are at a stage where fishers could understandably regard them as being a "fait accompli". Early engagement with fishing is essential to avoid conflict, and without full understanding of the operations of the fishing industry a zoned approach is nether useful or desirable.</p> <p>Proposed Policy 16: Marine aggregates and dredging</p> <p>The SFF would expect current sites for dredging and dumping to remain, but would not expect any new sites to be introduced without a full ecosystem assessment of their impact on commercial fisheries.</p> <p>Proposed Policy 18: Development of new telecommunication cables</p> <p>Engagement with Subsea Cables UK would seem appropriate to this proposal as they are the overarching trade body for that industry.</p>	<p>AP368: Ensure that appropriate early engagement with the fishing industry is promoted within the Draft Plan marine renewable energy policy and other appropriate sectoral policies.</p> <p>AP369: Ensure that the Draft Plan dredging and disposal policy requires an appropriate level of environmental assessment to be carried out to inform consenting decisions, taking particular account of potential effects on commercial fisheries and ecosystems.</p> <p>AP370: Invite Subsea Cables UK to be a key stakeholder for the PFOW MSP.</p>

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	<p>Proposed Policy 19: Commercial fisheries</p> <p>The importance of working with local stakeholders cannot, and should not, be ignored, but given the dynamic nature and mobility of the catching sector it will also be important to engage at the national level.</p> <p><i>Alternative:</i> For the SFF, the inclusion of the proposed alternative approach presumption against development in grounds scientifically proved to be important to fisheries would seem eminently sensible, and the embodiment of the precautionary approach.</p>	<p>Noted. National fisheries interests have been consulted.</p> <p>AP371: Note SFA's support for presumption against development in grounds scientifically proved to be important to fisheries when developing the commercial fisheries policy in the Draft Plan.</p>

*Responses number 3 and 31 were in relation to the draft Environmental Report and are not included here. Response number 11 cannot be made public as a Respondent Information Form was not received and number 18 was from an individual that did not give permission to make their response public.



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